Human Rights Due Diligence System Manual



TGI's Human Rights Due Diligence System Manual establishes systematic, articulated and traceable actions, aimed at the continuous improvement of the Company's performance in this area. Let's know a little about this Manual:



WHO DOES IT APPLY TO?

To all areas of the company, since its objective is to establish actions within the framework of Human Rights Due Diligence. It also extends to its value chain.

STAGES OF THE HUMAN RIGHTS DUE DILIGENCE **SYSTEM MANUAL**

1. Public commitment to human rights.

6. Mechanisms for grievances and remediation of adverse impacts

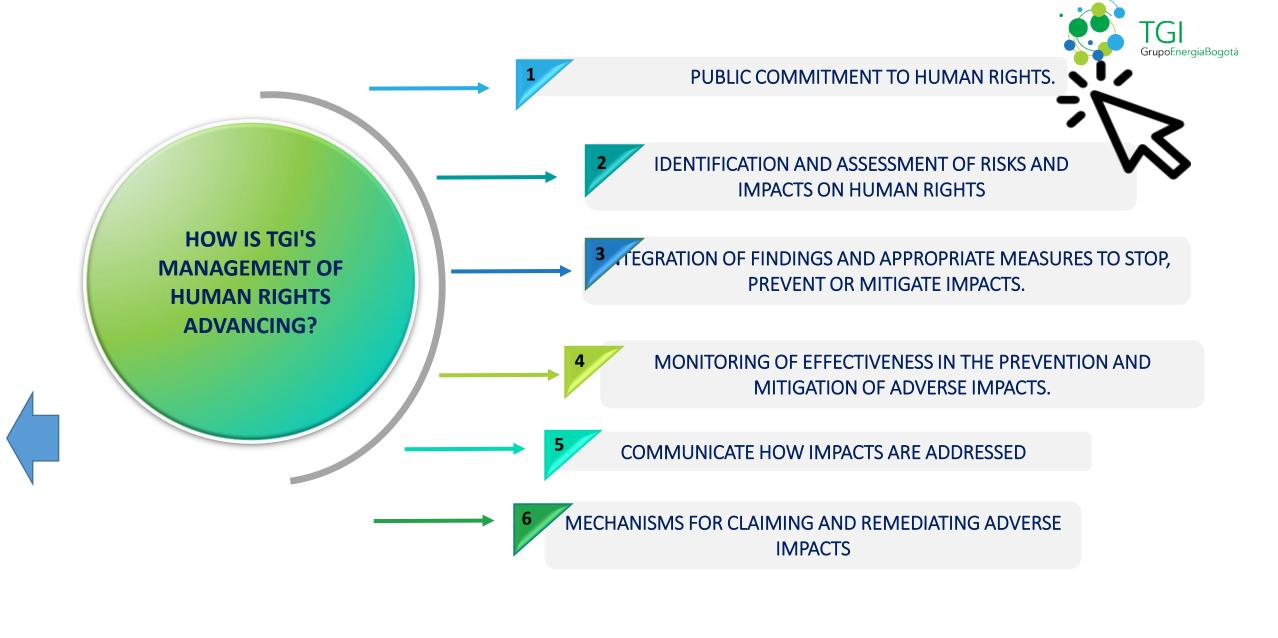
2. Identification and evaluation of risks and impacts on human rights

5. Communicate how impacts are addressed. 3. Integration of findings and appropriate measures to stop, prevent or mitigate impacts.

4. Monitoring of effectiveness in the prevention and mitigation of adverse impacts







PUBLIC COMMITMENT TO HUMAN RIGHTS.





Human Rights Policy

Within the framework of our political commitment to human rights, at TGI we have our **Human Rights Policy**. Let's get to know it:

The policy is made up of three important elements that you should be aware of:

OBJECT

Our Policy establishes the principles and guidelines that guide TGI in fulfilling its ethical and legal duty to respect, promote and repair Human Rights in all its actions and areas of relationship.

SCOPE AND RESPONSIBLE

This Policy applies to all TGI employees, as well as to suppliers and contractors within the framework of our business relationships.

 Respect for and promotion of Human Rights must be reflected in the management of all areas and the behavior of all employees.

ABOUT OUR HUMAN RIGHTS POLICY

- We recognize that human rights are a condition for sustainable development.
- We align ourselves with the Political Constitution of Colombia and international regulations, such as the UNGPs and the OECD Guide on Human Rights Due Diligence for Responsible Business Conduct.
- We pay special attention, but are not limited to, rights related to decent and safe working conditions, and to our supply chain.

WHO DOES TGI COMMIT TO IN ITS HUMAN RIGHTS POLICY?









COMMUNITIES



SUPPLIERS,
CONTRACTORS AND
PARTNERS

WHAT DOES TGI COMMIT TO IN ITS HUMAN RIGHTS POLICY?



Click to learn abo

Employee commitments:



- We work constantly to ensure decent and safe working conditions that contribute to the integral development of our employees.
- We reject any form of discrimination, violence or harassment in the workplace or sexual and promote the right to equality in employment and occupation, in accordance with the company's Diversity and Inclusion Policy.
- We recognize the individual and social importance of the right of association and collective bargaining and we fully comply with the legal provisions aimed at its protection.
- We respect the rights to free expression, participation and petitions of our employees, communities and our stakeholders in general. We establish strategies and mechanisms for the exercise of these rights with respect to our activities and promote mutual respect, trust and dialogue to manage differences. We will not tolerate any threat, intimidation, or other act of retaliation against the peaceful expression of opinions or concerns about our activities.



WHAT DOES TGI COMMIT TO IN ITS HUMAN RIGHTS POLICY?



Click to learn about TGI's commitr



Commitments to communities:

- The recognition, respect and promotion of the rights of communities.
- Our relationship with communities is based on respect for their individual and collective rights and is aimed at generating shared value for the improvement of territorial and socioeconomic conditions for the generation of development and well-being.
- We recognize the importance of the rights of communities to enjoy a healthy environment; to dispose of and enjoy their lands, goods and resources and to lead their lives free from fear of their safety, health and integrity. That is why we adopt a preventive management approach to avoid as much as possible the adverse impacts that our activities may cause, explore alternative solutions, and finally mitigate and compensate
- We value and respect the cultural diversity of communities. We promote mutual knowledge and understanding through intercultural dialogue, with special attention to the rights of ethnic communities.



EMPLOYEL.

WHAT DOES TGI COMMIT TO IN ITS HUMAN RIGHTS POLICY?



Click to learn about TGI's commitments to each stall-balder

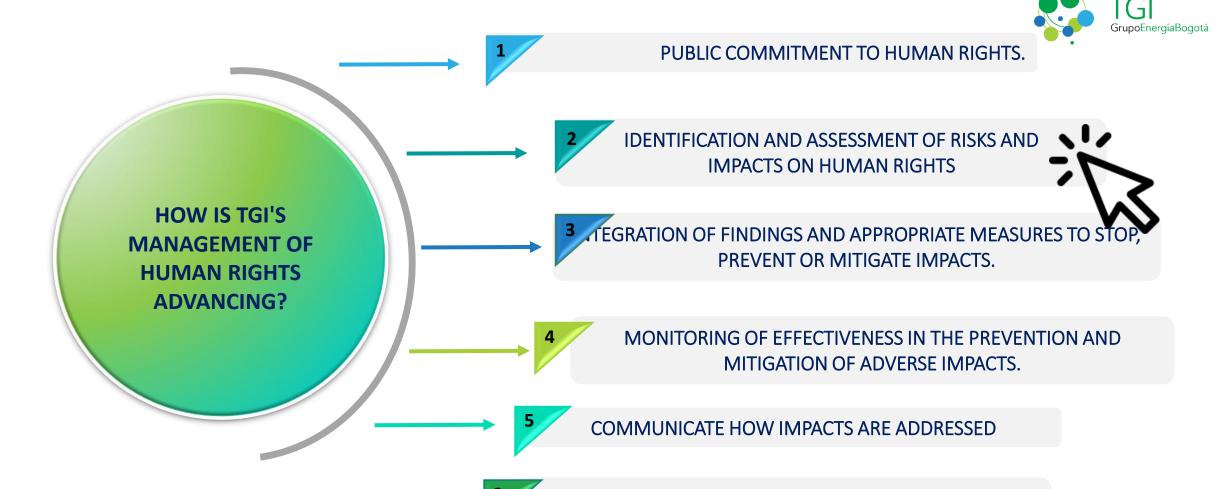


EMPLOYEES

Commitments to suppliers, contractors and partners:

- We do not tolerate forced or compulsory labour practices or the linking of child labour in our company or in our supply chain.
- We incorporate the duty to comply with our corporate policies, including this Policy, into business agreements with suppliers, contractors, and business partners, and implement due diligence, supervision, and sanction mechanisms in the event of non-compliance.
- We also promote collaboration with our supply chain partners to adopt best practices in line with international standards.
- We seek to ensure that our business relationships with partners, customers, and other business or institutional allies are guided by these principles and honor the commitments set forth in this Policy.





ESTABLISH MECHANISMS FOR GRIEVANCES AND REMEDIATION OF ADVERSE IMPACTS



The identification and evaluation of risks and impacts on human rights is carried out as one of the most relevant activities of the human rights due diligence process. Its objective is to guarantee an effective management of impacts that may be adverse to people and communities, in accordance with their nature and magnitude. Here we tell you how we have advanced in this exercise from TGI:

How is the severity of impacts assessed for proper prioritization?

The severity of impacts is assessed by their scale, scope and irremediability. TGI SA ESP considers these three factors to determine the severity or relevance of a potential impact on human rights, taking into account:

The "scale": the seriousness of the harm caused to the enjoyment of human rights;

The "scope": how many people have been affected, are or could be affected;

"Irremediability": difficulty in returning the right or rights to the affected owner.

Severity can be assessed at the activity, operation, or project level, and as part of an impact assessment or as a response to an emerging incident.

Eight impact areas to be assessed:

TGI SA ESP establishes eight areas of potential impact, which are adapted to the local context of the company's activities and operation:

Internship Labour

2. Communities

3 Business Relations

4 Supply chain

Privacy and digital technologies

6. Environm ent

7 Public Safety

Diversity, Equity, and Inclusion





HUMAN RIGHTS IMPACT ANALYSIS

The impact analysis aims to identify all the impacts that the company's operations, as well as that of its business relationships, may have on human rights, including the impacts generated in each project, as well as in the business value chain. Therefore, it includes suppliers, contractors, allies and any partner with whom the company establishes a business relationship (PRNU, number 18):

This process should:

to. To make use of internal and/or independent human rights experts;

b. Include substantive consultations with potentially affected groups and other stakeholders, depending on the size of the company and the nature and context of the operation."

It is important to remember that the human rights impact analysis focuses on the impacts of the company's activities on people and does not consider, in any case, the risks to the business.

Stages of an i	mpact analysis:
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Identification	of potential and actual impacts	
Evaluation	of certain impacts (actual and potential) to assign level of severity and establish prioritization in the measures	
Monitoring and evaluation of measures to prevent, mitigate and repair the impacts		
Identification/Evaluation	Are there any new impacts? What is its severity, periodic, and probability?	



DIFFERENCE BETWEEN ACTUAL AND POTENTIAL IMPACTS

Actual impacts are those in which it is confirmed that the company has caused or contributed to causing negative impacts on human rights, through its activities, products or services, as well as the impacts caused by the operations of its business relationships (contractors or partners).

Potential impacts are those that may occur or materialize in the future.

This distinction is important since for the real impacts, mitigation actions must be initiated and, where appropriate, reparation. For potential ones, prevention measures need to be established because they have not yet occurred.

CONSIDERATIONS FOR THE IMPACT IDENTIFICATION STAGE:

- 1. The risk assessment and the identification of impacts will be carried out considering the geographical context, operational activity and relations with stakeholders. This exercise should be carried out periodically because risks and impacts can change over time and with circumstances in a territory or operation.
- 2. The impact assessment will be deepened to determine, through an on-site exercise, those that are especially serious and their type of connection with the company, in order to establish effective prevention and mitigation measures. To do this, the probability of occurrence and the severity for people must be taken into account according to the criteria of scope, severity and remediability.
- 3. The actual and potential impacts on the development of the business operation will be considered, especially those that may require the application of the precautionary principle in an environment with specific expectations and demands.
- 4. Human rights risks and impacts for rights holders and not for the company will be considered.
- 5. Supply chain-related impacts will be examined in the medium term.



Within the framework of its commitment to Human Rights, TGI SA ESP has carried out different exercises and from different perspectives the **identification and evaluation of risks and impacts on Human Rights**. Here we tell you when and how we have made them:

Internal Diagnosis and Analysis of Human Rights Impacts and Risks from the Processes of TGI SA FSP.

2019- 2020

2021-2022

Risk assessment and identification of social impacts from the operation of TGI SA ESP, carried out in 100% of the areas of direct influence of the operational centres.

 Identification of outstanding issues in human rights, analyzed from 8 prioritized areas of influence and including the characterization of the context of the corresponding territories.

2023

2024

Human Rights Impact
Assessment conducted from
the perspective of rightholders
and from 4 impact areas:
Communities, supply chain,
business relations and labour
practices

RISK IDENTIFICATION AND ASSESSMENT AND IMPACTS ON HUMAN RIGHTS



Within the fr perspective

2019 - 2020

Internal Diagnosis and Analysis of Risks and Impacts on Human Rights from the processes of TGI SA ESP:

• It was carried out based on: (i) the analysis of critical socio-political factors of the national order of the human rights situation and (ii) the internal functional aspects most likely to generate human rights risks.

• Once the critical operational and environmental factors had been determined, the risks of affecting human rights and their assessment were carried out.

• The assessment of the magnitude of the risk was carried out on a scale of 1-5 according to the probability, impact, severity of the risk in human rights, scope and remediability.

• Among the main risks were issues associated with ethnic communities; work in dignified and safe conditions; use of force by private security; environment; and economic rights.

• An Action Plan was developed to manage the identified human rights risks. In the component "Stop, prevent or mitigate and remedy" you can learn more about this Action Plan.

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RISK IDENTIFICATION AND ASSESSMENT AND IMPACTS ON HUMAN RIGHTS



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2021-2022

Risk assessment and identification of social impacts from the operation of TGI SA ESP, carried out in 100% of the areas of direct influence of the operational centres:

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- An assessment of the risks and possible adverse impacts that may be generated in the areas of operation of TGI and the adverse impacts that alter good management practices and prevent the proper development of operations was carried out.
- In this assessment, direct, indirect or cumulative impacts were identified.
- It was carried out in 100% of the Operation Centers (8 operational infrastructures) and Gas Compressor Stations (16 operational infrastructures).

• It encompassed internal and external actors that directly or indirectly have a relationship with TGI such as contractors and subcontractors, local government and community in the area of direct influence.

• A total of 107 breaches were consolidated grouped into eight (8) risks.

• TGI designed an Action Plan with measures and actions to mitigate Human Rights for the risks identified. In the component "Stop, prevent or mitigate and remedy" you can learn more about this.

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2019

RISK IDENTIFICATION AND ASSESSMENT AND IMPACTS ON HUMAN RIGHTS



Within the framewo perspectives in the **a**

2023

Identification of outstanding human rights issues, analyzed from 8 prioritized areas of influence and including the characterization of the context of the corresponding territories:

The outstanding human rights issues are those whose management is critical for the company, either because they can generate more serious negative consequences on the effective enjoyment of rights of anyone associated with the company's operation (workers, customers, communities, among others), they are a trend in the sector and could affect the competitiveness of the company and/or the sustainability context in which operations are carried out requires a timely response on the part of the company.

It was carried out in 8 areas of influence prioritized by TGI.

- It includes the blocks of rights identified, the areas of impact prioritized by the company (supply chain, customers, communities and labor practices) and the description of each highlighted human rights issue, which includes the characterization of the context of the corresponding territories.
- Salient issues related to environment and health, indigenous peoples, access to information and participation, adequate standard of living, work and working conditions and safety were identified.

Internal Diagnosis and Anal of Human Rights Risks fro the Processes of TGI SA E

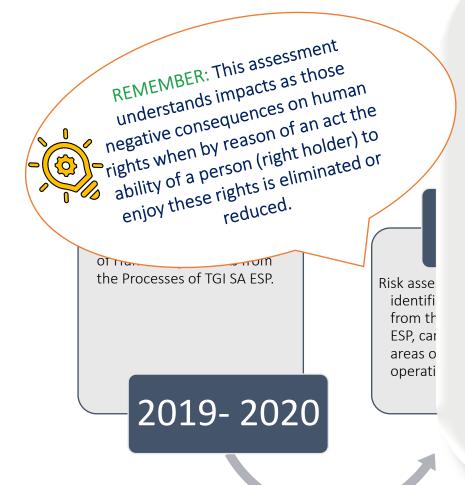
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2024

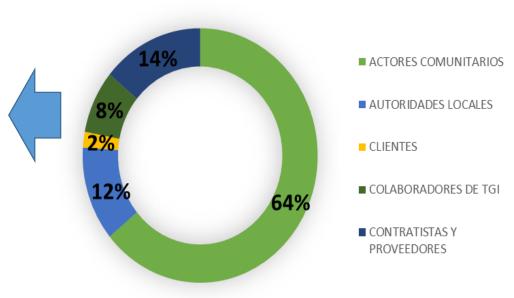
Human Rights Impact Assessment conducted from the perspective of rightholders and from 4 impact areas: Communities, supply chain, business relations and labour practices:

- According to the United Nations Guiding Principles on Business and Human Rights, companies must assess the negative consequences that their activities may have on people and establish appropriate management measures for them from the perspective of the rights holders and not from the risks to the company.
- The types of impacts, according to the Guiding Principles, can be: actual, potential and perceived.
- The **type of involvement of the company** can be: cause, contribution and relationship.
- For this evaluation, **8 municipalities of influence of TGI were prioritized:** Riohacha (La Guajira), Mariquita (Tolima), Pradera (Valle del Cauca), Villavicencio (Meta), San Pablo (Sur de Bolívar), Marsella (Risaralda), Páez and Briceño (Boyacá).
- The assessment **prioritized 4 areas of TGI's impact**: Communities, Supply Chain, Customers, and Labor Practices.



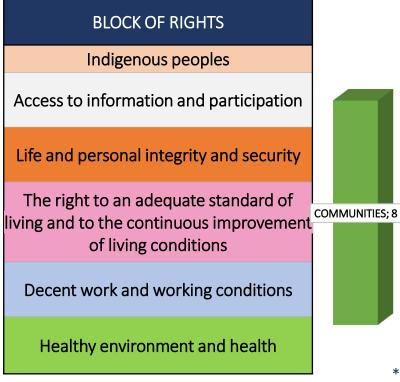
The results of our latest human rights impact assessment were conducted from the perspective of rights holders.

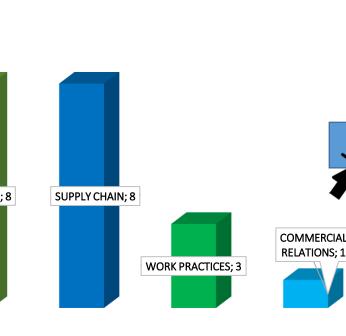
WE CONSULTED 250 PEOPLE THROUGH INTERVIEWS AND FOCUS GROUPS



OUR 11 IMPACTS WERE LOCATED IN 6 **BLOCKS OF RIGHTS**

OUR IMPACTS WERE MAINLY RELATED TO TWO AREAS





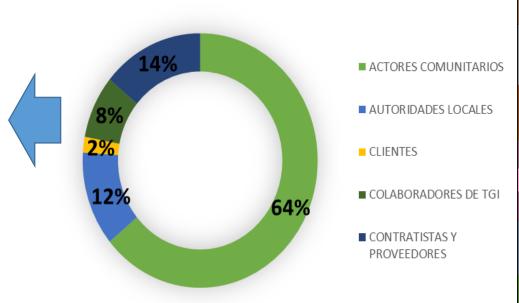
*Please note that some of our impacts relate to two or more areas

Rights holders consulted:

During this exercise, the following rights holders were consulted: Women, indigenous population, Afro-descendant population, local authorities, contractors, clients, collaborators and local communities.

OUR 11 IMPACTS WERE LOCATED IN 6 BLOCKS OF RIGHTS

WE CONSULTED 250 PEOPLE IN INTERVIEWS AND FOCUS GROUPS



BLOCK OF RIGHTS

Indigenous peoples

Access to information and participation

Life and personal integrity and security

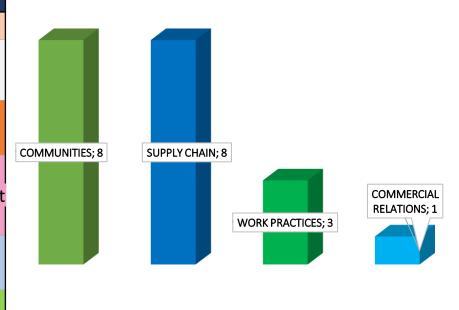
The right to an adequate standard of living and to the continuous improvement of living conditions

Decent work and working conditions

Healthy environment and health

WERE MAINLY RELATED

OUR IMPACTS WERE MAINLY RELATED FROM 4 AREAS



*Please note that some of our impacts relate to two or more areas

Integration of human rights risks into TGI SA ESP's Strategic Risks

TGI Risk Management Model

On the other hand, through the Model, we identify and manage those events at a strategic level, processes and projects with a focus on continuous improvement.



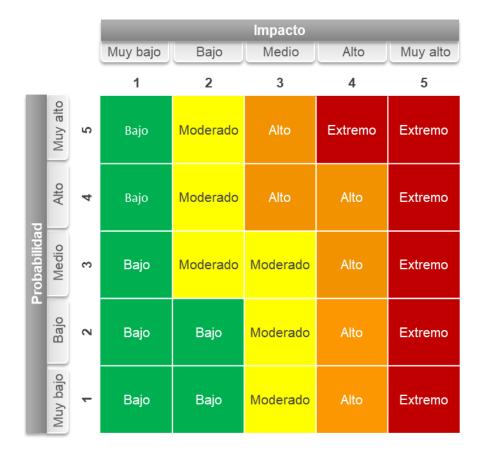
	Strategic Risk	
1	Regulatory and normative changes with business impact	
2	Non-continuity of critical business functions	
3	Vulnerabilities to cyberattacks that compromise the security of the information and the cybersecurity of the operation	
4	Changes in market behaviour in relation to gas consumption and demand	
5	Economic effects due to uncertainty in long-term supply	
6	Economic impacts on the business due to internal conflicts in the country (social, armed, etc.)	
7	Failure to meet the company's financial goals or required return on capital	
8	Non-compliance with the ethical and regulatory framework for compliance	
9	Difficulties in adapting operating infrastructure as a result of climate change	
10	Operational technological obsolescence and availability of adequate resources	
11	Impact on the development of projects due to environmental effects or non-	
12	Violation of Human Rights (HR) by TGI, collaborators or contractors	

Our strategic risk matrix incorporates the risk "Violation of human rights by TGI, collaborators or contractors", this as a good practice that allows us to respond to internal and external situations as a result of global and sector trends and dynamics that prepare us for possible emerging and process risks.

Risk assessment of TGI with a human rights approach



At TGI we always want and work to improve, which is why we carry out a risk standardization process that allows us to locate the human rights impacts of our latest assessment in TGI's strategic risk matrix.



Why is this approval made?

The process seeks to ensure that through our corporate matrix we can assess risks and impacts with a human rights approach from the perspective of the right holders and considering the three variables established by the United Nations Guiding Principles on Business and Human Rights:

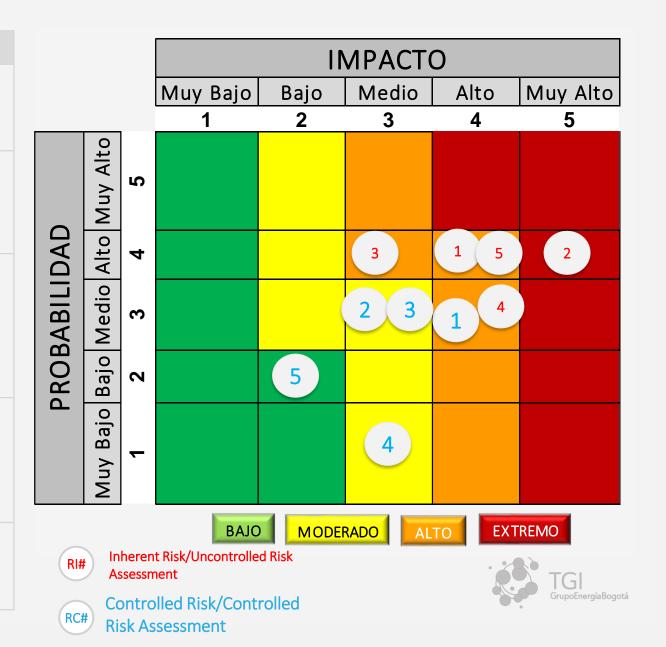
- ✓ Scale
- ✓ Scope
- ✓ Irremediable character





Top 5 human rights impacts/risks

	HUMAN RIGHTS IMPACT/RISK	AREA OF IMPACT
1	Limitation of the right to rest and enjoyment of free time of TGI administrative and operational employees due to high workload.	Work Placements
2	Affectation of the cultural rights of indigenous communities as a result of direct and indirect activities of TGI and other companies in the extractive sector.	Supply Chain Communities
3	Physical and environmental damage to the infrastructure of the properties and to the surroundings of the communities that are located near or on the company's right-of-way due to TGI operating activities and/or maintenance of the gas pipeline by suppliers and contractors.	Supply Chain Communities
4	Limitation of the effective enjoyment of the rights to information and participation on the mitigation and prevention of risks of the gas pipeline to rights holders due to communication gaps between TGI, its contractors and the communities in the area of influence.	Supply Chain Communities
5	Physical and mental health effects due to the presence of TGI infrastructure that generates a sense of risk in the surrounding communities.	Communities



One of the stages that is strengthened in the Due Diligence process is Stage 2. Identification and evaluation of impacts.



Prioritized municipalities: Riohacha (La Guajira), Mariquita (Tolima), Pradera (Valle del Cauca), Villavicencio (Meta), San Pablo (Sur de Bolívar), Marsella (Risaralda) and Páez y Briceño (Boyacá)





In addition, as part of this evaluation of human rights impacts, we also developed spaces for **socialization**, **feedback and joint construction** on the findings in the 8 municipalities.



WORKSHOPS ON SOCIALIZATION, FEEDBACK
AND ASSESSMENT OF THE PROBABILITY OF
IMPACTS ON HUMAN RIGHTS WITH 8
INTERNAL AREAS OF TGI

WORKSHOPS ON SOCIALIZATION AND FEEDBACK ON HUMAN RIGHTS ACTION PLANS WITH 8 INTERNAL AREAS OF TGI

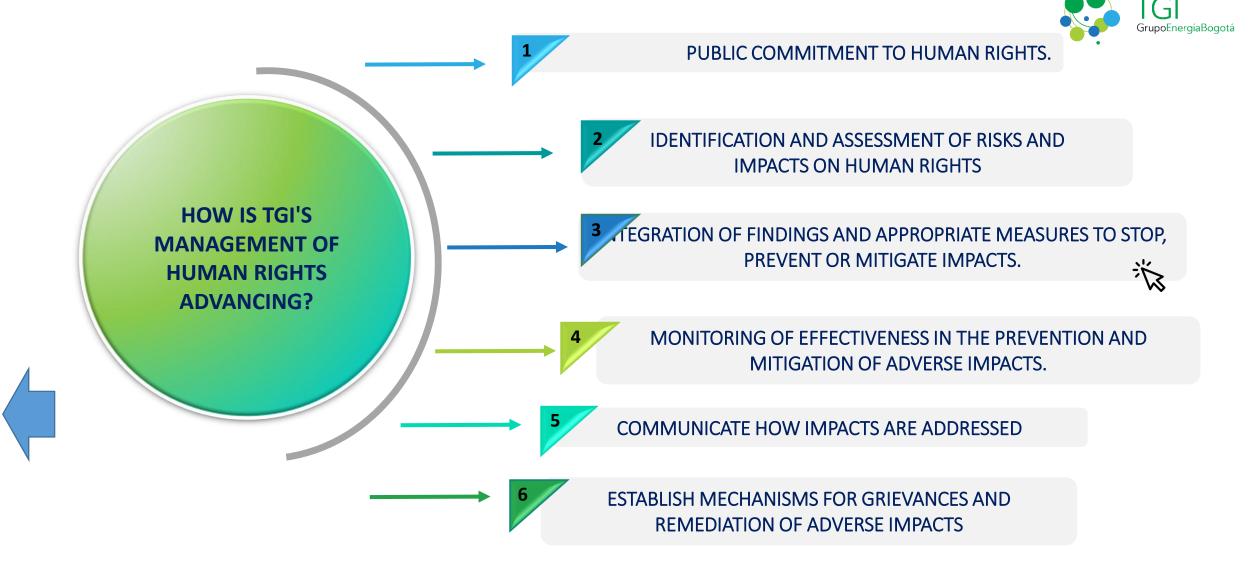




For the process of strengthening the due diligence system, TGI has appropriate measures to stop, prevent or mitigate human rights impacts.



TGI SA ESP has made progress in different prevention and mitigation measures and actions, integrating its processes, guidelines and principles of action. At the same time, training spaces have been held that have made it possible to strengthen the culture of Human Rights in TGI and establish good practices in Human Rights.

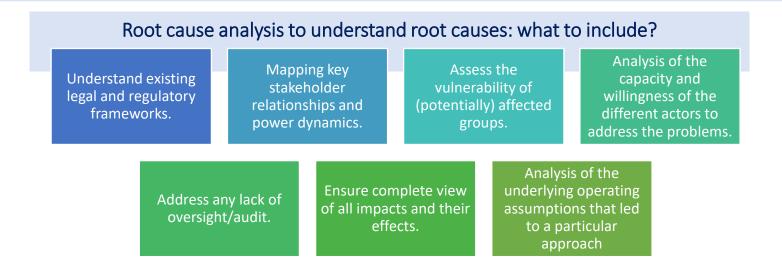


INTEGRATION OF FINDINGS AND APPROPRIATE MEASURES TO STOP, PREVENT OR MITIGATE IMPACTS.



At this stage, the company takes appropriate measures in response to the risks and impacts that are identified. **Potential impacts** will be addressed through prevention or mitigation, while actual **impacts**, those that have already occurred, must be remediated.

To address risks and impacts, it is important to understand their root causes



Ensure complete view of all impacts and their effects.

Once measures have been taken to address the most serious human rights impacts and risks, the company prioritizes the remaining human rights risks, again analyzing their severity and likelihood.

When adverse impacts occur despite all efforts to prevent them, and the company identifies what caused or contributed to those adverse impacts, then there is a need to provide or cooperate in remediation.

INTEGRATION OF FINDINGS AND APPROPRIATE MEASURES TO STOP, PREVENT OR MITIGATE IMPACTS.

Based on the findings in the risk and impact assessment, TGI SA ESP has advanced in different prevention and mitigation measures and actions, integrating its processes, guidelines and principles of action. At the same time, training spaces have been held that have made it possible to strengthen the culture of Human Rights in TGI and establish good practices in Human Rights.

Here are some of these measures and actions: that we at TGI have implemented:

- 1. Contracting Manual and execution control: For all contracts with the Company, natural or legal persons must attach, if applicable, their Human Rights and Sustainability Policy. In any case, they will sign the Company's Sustainability and Human Rights Policy as an integral part of the Contract and will undertake to respect it. The evidence of its violation will constitute grounds for unilateral and justified termination of any contractual relationship with the Company and exclusion from the register of suppliers prior to exhaustion of due process.
- 2. Contractual clauses that require respect and promotion of human rights between suppliers and contractors:
- ✓ The CONTRACTOR acknowledges, accepts and guarantees that it has read, understood, adheres to and will comply with THE COMPANY's Human Rights Policy, which is an integral part of the Contract.
- ✓ THE CONTRACTOR undertakes to behave and ensure that its employees, representatives and agents behave, during and in connection with the execution of the Contract in accordance with the provisions of the Sustainability Policy and the Human Rights Policy of THE COMPANY.
- ✓ The CONTRACTOR guarantees that, in the development of all the activities carried out within the framework of the commercial relationship with THE COMPANY, it designs and implements actions aimed at preventing and mitigating the risks and impacts (actual and potential) on the human rights associated with its operation and thus comply with its duty to respect them.
- 3. Code of Ethics and Conduct for Suppliers and Contractors: Suppliers and Contractors must ensure respect for and promotion of human rights, the protection and care of the environment and the implementation of practices that promote fair and equitable labor relations. As an integral part of the contract with TGI, Suppliers and Contractors must adhere to TGI's Human Rights Policy and must commit to respecting it.
- 4. Code of Ethics and Conduct for Employees: All TGI employees must act with social responsibility and respect for Human Rights, generating guarantees of a work environment in which dignity, respect and integrity prevail, as well as fair treatment with adequate working conditions for all Employees and respect for their privacy. rejecting any situation of child, involuntary or forced labour.

INTEGRATION OF FINDINGS AND APPROPRIATE MEASURES TO STOP, PREVENT OR MITIGATE IMPACTS.



- 5. OSH, Environmental and Social Manual for contractors: suppliers and contractors must act and promote respect for and guarantee of Human Rights, diversity and inclusion, wage equity and decent work, transversal and fundamental axes for THE COMPANY, actions that must be part of the induction and training plan for the personnel linked to the project, works and/or activities, generating the corresponding supports and evidence.
- 6. Kraljic Matrix for the classification of suppliers with a focus on sustainability and Human Rights: The Kraljic matrix is an instrument used to classify purchasing strategies with suppliers according to categories that group them; a version focused on the sustainability of the supply chain was designed and implemented that also classifies groups of suppliers. After this, and according to the classification, the Chessboard was used, focused on generic methods of relationship based on Human Rights.
- 7. Inclusion of Human Rights Risks in the Contractual Risk Matrix: The contractual risk matrix allows identifying, analyzing, assessing and establishing a response plan in advance of risks inherent to the violation of Human Rights, this during the planning stage of the company's contracting processes.
- 8. Inclusion of Human Rights Risk in the Corporate Strategic Risk Matrix: the strategic risk matrix incorporates the risk "Violation of Human Rights by TGI, collaborators or contractors", this as a good practice that allows us to respond to internal and external situations as a result of global and sector trends and dynamics that prepare us for possible emerging and process risks.
- 9. First Steps in Corporate Social Responsibility Program for the Supply Chain: In the last 3 years, TGI has been promoting and encouraging suppliers and contractors to join and be part of the First Steps in Corporate Social Responsibility program, which is developed by the Universidad Externado de Colombia and the Global Compact Network Colombia. The purpose of the program is to identify and propose actions to implement or strengthen ESG criteria in suppliers and contractors, including Human Rights issues.
- **10. Human Rights Training for Suppliers, Contractors, Collaborators and Senior Management:** During the last 5 years, TGI SA ESP has been developing and strengthening capacities and knowledge in Human Rights through workshops, talks and training in different areas and topics of in-depth study of Human Rights. Some of the ones mentioned below:

9. Human Rights Training for Suppliers, Contractors, Collaborators and Senior Management:

2020

Eight (8) workshops to deepen human rights in six specific topics:

- 1. Socio-environmental management and Human Rights.
- 2. Management of PQRS with a Human Rights approach.
- 3. Analysis of Risks and Impacts on Human Rights.
- 4. Security and Human Rights.
- 5. Fundamental Labor Rights.
- 6. Due Diligence ir Multicultural Engagement

The workshops were aimed at TGI employees

2021

- 4 Human Rights Workshops which included the following topics:
- 1. Fundamentals of due diligence in human rights
- 2. Conceptual and institutional framework in human rights
- 3. Potential impacts of the Company on human rights from the role of the employee.
- 4. Challenges of the company in Human Rights

The workshops were aimed at TGI employees and were certified by Global Compact Colombia.

2022

* Talk on Human Rights and Business Strategy aimed at the Board of Directors of TGI developed by the Global Compact and the Universidad Externado de Colombia.

* 2 Human Rights in the Supply Chain in-depth workshops aimed at critical TGI suppliers, which were certified by Global Compact Colombia.

2023

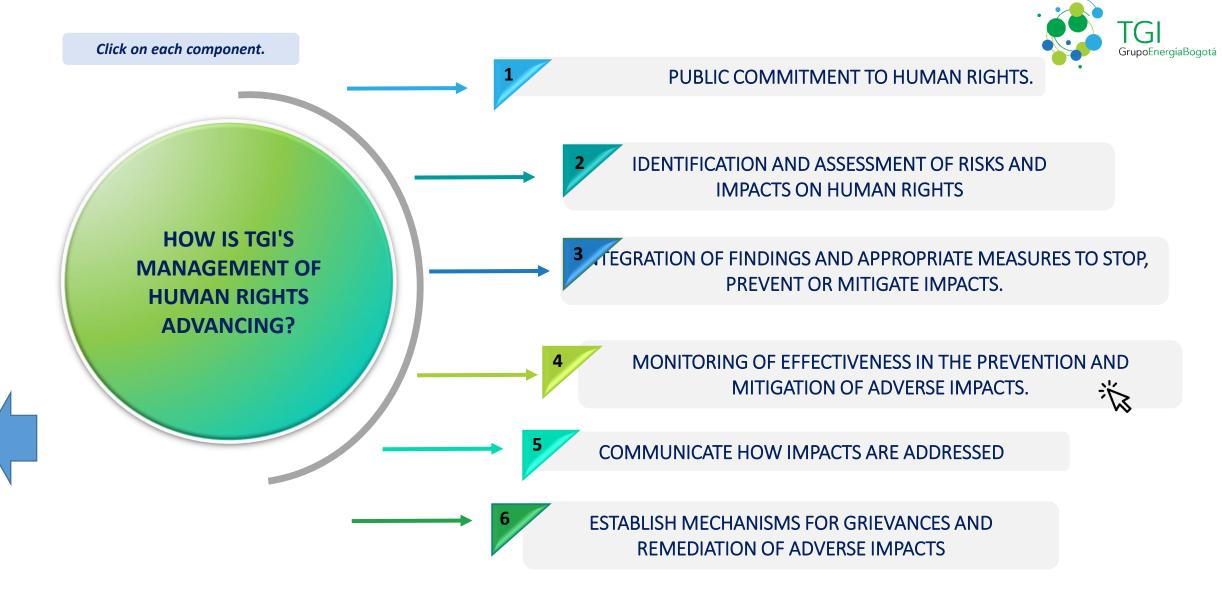
* 2 Workshops on Business and Human Rights and the ABC on Human Rights aimed at TGI suppliers and contractors, which were certified by the Ideas for Peace Foundation.

* 1 basic course in Human Rights aimed at TGI employees and developed by GEB through the success factors platform.

2024

- *1 workshop (face-to-face)
 implementation of tools
 with a focus on human
 rights aimed at suppliers
 and contractors developed
 by the IFJ.
- * 1 Workshop on Human Rights with a focus on labor rights aimed at the TGI Labor Coexistence Committee.
- * Talk on Human Rights
 Challenges in
 Organizations and the Call
 to Action from Business
 Leaders addressed to the
 TGI Chair Committee

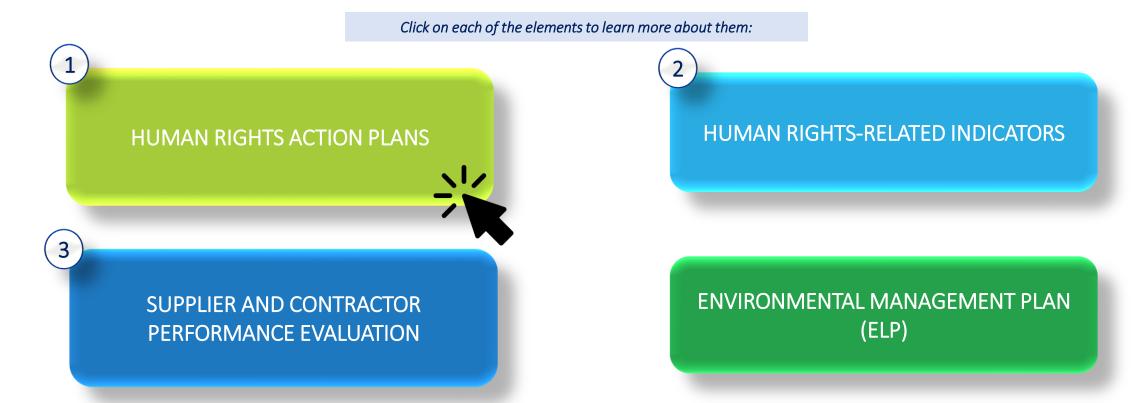






The company monitors the implementation and effectiveness of due diligence activities, i.e., measures to identify, prevent, mitigate and, where appropriate, assist in the remediation of impacts, including their relationships and/or business ties. Effectiveness tracking can be done through standalone monitoring tools or integrate monitoring into existing management systems. It can be beneficial to record efforts and lessons learned, so that processes can be continuously improved and any new risks and human rights impacts that arise can be assessed.

At TGI we monitor the implementation of actions to stop, prevent or mitigate human rights impacts in our operations. Below, we will tell you about some of the tools and processes that allow us to carry out this monitoring:





Construction of Action Plans

At TGI we have built action plans for the management of risks and impacts on human rights, which we have designed based on the various exercises of identification and evaluation of risks and impacts on Human Rights that we have carried out in recent years:

2020

Construction of an action plan for our operations based on the Human Rights Risk Analysis.



2021

Due diligence process in eight (8) prioritized municipalities from which an Action Plan was built for the management of the identified risks, which included commercial relations and supply chain.

2024

Action plan for the management of human rights impacts identified by the IFJ, focused on 4 areas of impact: supply chain, labor practices, business relations and communities.

The Human Rights Action Plans allow us to define the actions, periodicity and responsibilities for the management of the identified risks and the measures proposed to manage the risks and impacts on our operations.



Construction of Action Plans

The Action Plans allow us to meet four objectives:

1

Strengthen our human rights management in accordance with the benchmarks of good practices and international standards.

2

Define prevention,
mitigation, and
reparation measures
for human rights
impacts, timelines, and
assign those
responsible.

3

Implement actions that contribute to the respect of rights from the perspective of rights holders and strengthen our relationship with these holders by involving them in the design, implementation and monitoring of measures.

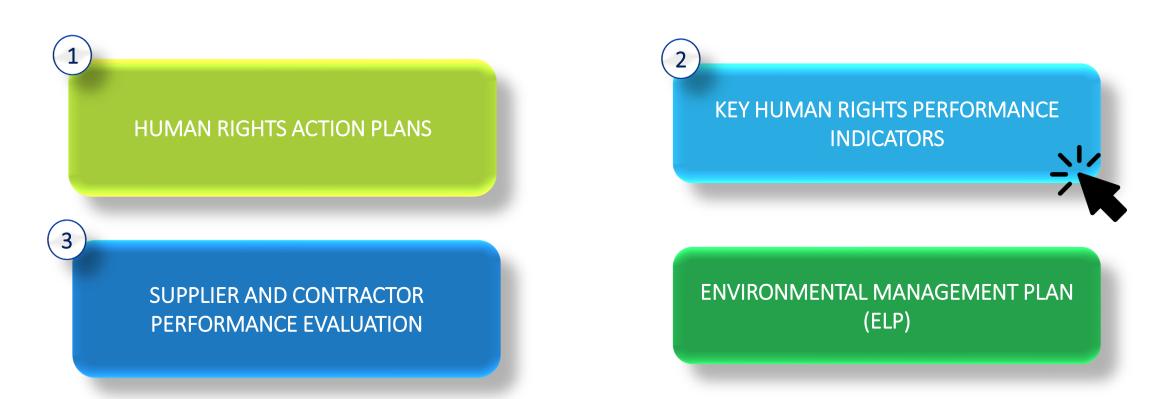
4

Implement timely management measures to manage impacts related to our suppliers, contractors, and business partners.





At TGI we monitor the implementation of actions to stop, prevent or mitigate human rights impacts in our operations. Below, we will tell you about some of the tools and processes that allow us to carry out this monitoring:





Key Performance Indicators for Human Rights Due Diligence.

TGI SA ESP establishes key performance indicators (KPIs) to track the effectiveness of measures to mitigate human rights risks and impacts. Some of the indicators are based on international benchmarks and standards such as GRI and DJSI:

GRI Indicators

The GRI indicators allow us to check to what extent the proposed human rights goals are met in our operations. Some of the topics we report are:

- Human Rights Measures: Implementation of policies of respect for human rights, and mechanisms for evaluation, control, internal disciplinary measures, due diligence and remediation actions.
- **Supply chain:** Implementation of actions for the selection and contracting of suppliers and contractors based on respect for human rights and the use of mechanisms to identify negative social impacts.
- Human Rights Training: Implementation of training actions in human rights policies and procedures for personnel including security personnel.
- **Environment:** Implementation of actions to avoid affecting or improving the environment where the operation takes place.

Some of the Human Rights Indicators that TGI measures are:

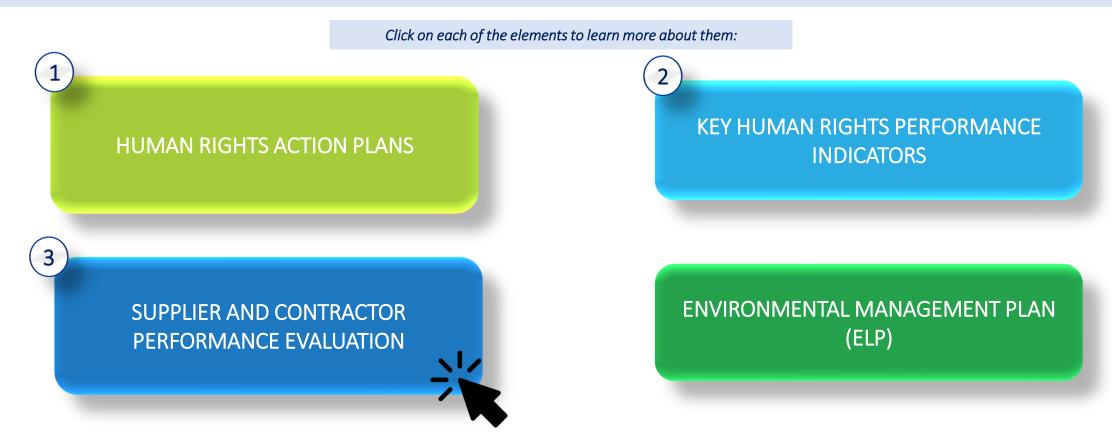
THEME	INDICATORS	
Harris Bishts	Total number of PQRS in human rights	
Human Rights Measures	Total number of contracts with human rights criteria	
	Total number of performance evaluations of suppliers with human rights criteria	
Discrimination	Turnover rate by hierarchical level of the organization	
	Total number of cases of discrimination, workplace and/or sexual harassment reported	
Freedom of Association	Total number of workers in the organization who belong to the Union	
Supply chain	Percentage of workers hired through third parties.	
	Total number of vulnerable communities in the organization's area of influence	
Communities	Percentage of skilled labor and Percentage of unskilled labor hired.	
	Number of people displaced outside the territory by the organization's operations	
	Number of staff trained in Human Rights	
Human Rights	Number of collaborators of the Public Force, surveillance companies and private security training in Human Rights	
Training	Number of contractors and suppliers trained in Human Rights	
	Investment in human rights training and updating by hierarchical level	
	Percentage of GHG emissions by geographical area	
Environment	Percentage of renewable energy use for infrastructure operation	
	Percentage of water consumption for infrastructure operation	







At TGI we monitor the implementation of actions to stop, prevent or mitigate human rights impacts in our operations. Below, we will tell you about some of the tools and processes that allow us to carry out this monitoring:



SUPPLIER AND CONTRACTOR PERFORMANCE EVALUATION



At TGI we also monitor compliance with our policies in the supply chain, for this we have the Supplier and Contractor Performance Manual, which contains general guidelines that regulate the **performance evaluation** to which all suppliers/contractors of goods and services of the company are subject. Let's find out how it works:

OBJECTIVE

Qualifies the contractor's performance in relation to the fulfillment of obligations contracted in the contract or agreement

PERFORMANCE EVALUATION CRITERIA

Criteria associated with human rights are taken into account, such as compliance with corporate social responsibility, environmental management and industrial safety, occupational health and risk prevention.

PERIODICITY

Periodic evaluations are carried out during the execution of the contract.



RESULTS AND ACTION PLANS

When the result of the performance evaluation is "fair" or "deficient", the Contract Supervisor shall agree on an improvement plan with the supplier or contractor to improve its performance.

CONTRACT SUPERVISOR

Responsible for carrying out the performance evaluation of suppliers and contractors during and at the end of the execution of a contract. Also, to follow up on the improvement plans that suppliers/contractors must propose and execute.

CONTRACT AFFAIRS AND SUPPLY MANAGEMENT

Responsible for managing the supplier and contractor performance evaluation tool; to make statistics or reports on the management of suppliers; and consolidating the information on the results of the evaluations.

MONITORING OF EFFECTIVENESS IN THE PREVENTION AND MITIGATION OF ADVERSE IMPACTS.



At TGI we monitor the implementation of actions to stop, prevent or mitigate human rights impacts in our operations. Below, we will tell you about some of the tools and processes that allow us to carry out this monitoring:

Click on each of the elements to learn more about them: **KEY HUMAN RIGHTS PERFORMANCE HUMAN RIGHTS ACTION PLANS INDICATORS ENVIRONMENTAL MANAGEMENT PLANS SUPPLIER AND CONTRACTOR** (ELP) PERFORMANCE EVALUATION

MONITORING OF EFFECTIVENESS IN THE PREVENTION AND MITIGATION OF ADVERSE IMPACTS.



Environmental Management Plans

We are a company committed to all the obligations established by Law, that is why:

Click to advance:



We carry out **environmental follow-up and monitoring of our activities** within the framework of compliance with the obligations contained in the Environmental Management Plans (EMP) of our entire operation.

Learn here about some of the main risks that we identify and monitor at WFP.

Environmental Management Plan



We are a company committed to all the obligations established by Law, that is why:

Click to advance:



Key impacts we identify, assess, and track at WFP:

Environmental: Change in sound pressure levels, alterations in the quality of surface water resources, changes in the structure and physicochemical characteristics of the soil, modification of vegetation cover.

Socioeconomic activities of the communities in the area of influence: Modifications of the economic activities of the area, change in the capacity of community organization, generation of job expectations, generation/alteration of social conflicts in the community, modification of road infrastructure and impact on crops.



nd

Environmental Management Plan



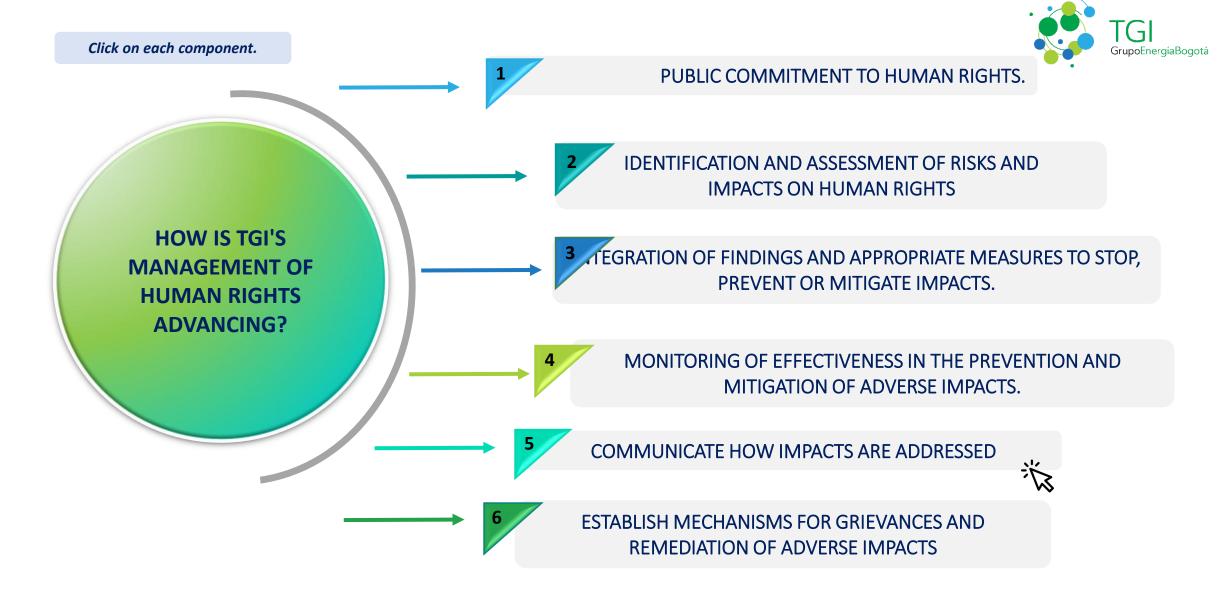
We are a company committed to all the obligations established by Law, that is why:

Click to advance:



We carry out **environmental follow-up and monitoring of our activities** within the framework of compliance with the obligations contained in the Environmental Management Plans (EMP) of all our operations with an Environmental Licen

Learn here about some of the main risks that we identify and monitor at WFP.



COMMUNICATE HOW HUMAN RIGHTS IMPACTS ARE ADDRESSED





The responsibility to respect human rights requires companies to make it known that they respect human rights in practice. This means communicating, providing transparency and accountability to individuals or groups who may be affected and to other stakeholders, including investors, in different ways.

! Let's get to know our mechanisms and how we communicate with our stakeholders at TGI!



This is the part of "knowing" and "showing" respect for human rights, and ensures transparency about it

COMMUNICATE HOW HUMAN RIGHTS IMPACTS ARE ADDRESSED



Stakeholder engagement

At TGI, we recognize as stakeholders the people or group of people who generate impacts on the organization or who are impacted by the different decisions, activities, products or services provided by the Company.

Our 13 stakeholders are:



Colaboradores



Entidades gubernamentales y entes de control



Clientes (remitentes)



Junta Directiva



Gremios y asociaciones Consumidores finales





Medios de comunicación y líderes de opinión



Comunidades y actores del territorio



Contratistas y proveedores



Inversionistas



Entidades financieras y calificadoras de riesgo



Accionistas



estratégicos











5

COMMUNICATE HOW HUMAN RIGHTS IMPACTS ARE ADDRESSED

Stakeholder engagement



Through our four (4) relationship axes, *Inform, Train, Feedback and Position*, we establish contact channels and deliver clear and timely information to the actors, ensuring that the issues of interest of each group are addressed. Let's get to know them:

Click on each axis to learn about the following:



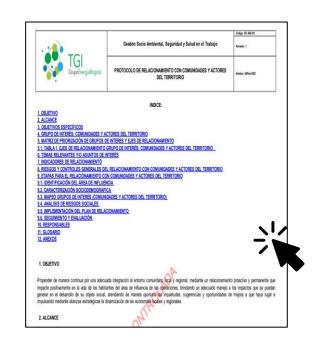
TGI GrupoEnergíaBogota

Stakeholder engagement

Likewise, to ensure that we have an **effective and good relationship** with our different stakeholders, **at TGI we have three Protocols and Manuals** that guide us in this interaction exercise. Let's get to know them:



Stakeholder Relations Manual



Protocol for relations with communities and actors in the territory



Guidelines for Intercultural Engagement with Ethnic Communities



Likewise, to ensure that Manuals that guide us

ree Protocols and



Stakeholder Relations Manual:

- It states the identification of the company's stakeholders, the objective of relationship with each of them, as well as the mechanisms and topics of conversation and interest, around which we establish our interaction and we can consolidate mutually beneficial relationships, generate synergies and provide an adequate and timely response to their requirements.
- Here you will learn the basic concepts to understand our relationship with stakeholders, including risks, controls, indicators and capacity building. These guidelines will be useful for your orientation when designing a relationship strategy with each audience.
- Learn more about this Manual at (link).
 https://www.tgi.com.co/content/download/33863/file/GUIA%20DE%20RELACIONAMIENTO%
 20CON%20LOS%20GRUPOS%20DE%20INTERE%CC%81S%20TGI.pdf

Stakeholder .



communities and actors in the territory

Engagement with Ethnic Communities



Likewise, to ensure the Manuals that guide (

hree Protocols and



Protocol for relations with communities and actors in the territory

- It seeks that TGI continuously orients ourselves for an adequate integration into the local and regional community environment, through a proactive and permanent relationship that positively impacts the lives of the inhabitants of the area of influence of our operations, providing adequate management to the impacts that may be generated in the development of its corporate purpose. attending in a timely manner to the concerns, suggestions and opportunities for improvement that may arise and promoting through strategic alliances the dynamization of local and regional economies.
- Here you will find the prioritization matrix of stakeholders and relationship axes, relevant topics and/or issues of interest, relationship indicators, risks and general controls of the relationship, stages for the relationship and those responsible.
- Learn more about this Protocol at (link).

Stakeholu



territory

Communities



Likewise, to ensure that

ree Protocols and

Manuals that guide us Guidelines for Intercultural Engagement with Ethnic Communities



- It defines corporate guidelines for Intercultural Relations with Ethnic Communities, as a continuous process through which TGI, together with its suppliers and business partners, voluntarily identifies, prevents, mitigates and repairs negative effects on human rights derived from its operations.
- They apply in the phases of licensing, construction, operation and maintenance of projects in which the transitory, physical or spiritual presence of ethnic groups that overlap with the area of influence of a project or assets of the company is identified, regardless of whether they are recognized or not to advance a prior consultation.
- They are also in harmony with TGI's Human Rights and Sustainability Policy, as well as with other international regulations.
- Learn more about these Guidelines at (link).
 https://www.tgi.com.co/content/download/32286/file/Directrices%20para%20el%20Relacina miento%20Imntercultural.pdf

Stakeholder

communities and actors in the territory

Engagement with Ethnic Communities

Retur



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Stakeholder Relations Manual



Protocol for relations with communities and actors in the territory



Guidelines for Intercultural Engagement with Ethnic Communities



What are the mechanisms for relating to our stakeholders?





1

Internal digital channels:
bulletin boards, newsletters, videos and intranet.

2

External digital channels: social networks, electronic newsletters, TGI website, press releases and advertising.

4

Meetings and Committees; personal, telephone or virtual interviews; and/or brainstorming exercises.

3

Training spaces:
focus groups;
seminars,
workshops and
conferences,
forums and
symposia.

Diálogos multistakeholder Others: Speeches and presentations at forums and conferences, road shows and/or media interviews.

6

Why is good stakeholder engagement important for TGI?



L

It enhances the ability to manage existing and emerging risks related to stakeholders.

4

It reinforces two-way trust with our stakeholders.

2

It consolidates the good reputation of the company and those of us who are part of it.

5

It updates us on the market dynamics that occur in the environments of our audiences.

7

It strengthens strategic business decision-making based on the direct and indirect participation of stakeholders.

3

It gives us access to constant learning from our stakeholders, promoting improvement in our management and mitigating human rights risks. 6

It allows us to deliver information and educate our stakeholders, facilitating decision-making and actions that affect them and society in general.



TGI's human rights communication tools and mechanisms:

Through the website we publicize the Human Rights management in which we have been constantly advancing. Check out our Sustainability/Human Rights session website https://www.tgi.com.co/sostenibilidad/derechos-humanos

Another communication tool is the **Sustainability Reports**, which are part of our annual exercise of transparency and accountability with stakeholders. In these, we present our **management in the field of Human Rights** and **present information that responds to indicators of:**

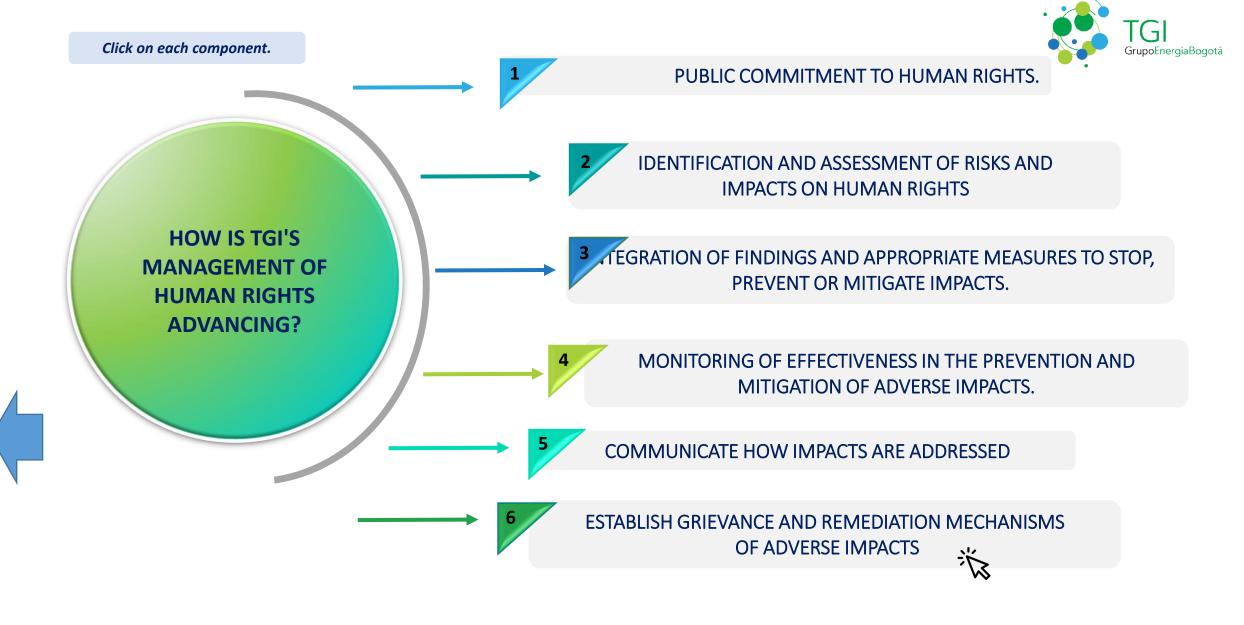
- ☐ GRI and its GRI 11 sector: "Oil & Gas",
- ☐ Sustainability Accounting Standards Board (SASB) in its section for industries belonging to the "Oil & Gas Midstream" sector,
- ☐ Corporate Sustainability Assessment (CSA) para el Dow Jones Sustainability Index (DJSI),
- ☐ Task Force on Climate Related Financial Disclosures (TCFD), y
- ☐ The Sustainable Development Goals (SDGs).

Respect for human rights is one of the principles of our sustainability strategy, learn more about it in our Sustainability Reports:

https://www.tgi.com.co/sostenibilidad/infor mes-de-sostenibilidad









Human Rights-Related Grievance Mechanism

Grievance mechanisms are processes that allow for the receipt, investigation, and response of complaints from affected parties in a timely, fair, and consistent manner, while also acting as an important means of providing redress. They thus become an early detection system to raise awareness of new issues that feed back into the human rights due diligence process. In this way, they can inform the human rights assessment and provide a means to track the effectiveness of a company's human rights performance.

Characteristics of the reception channels that make up the grievance mechanism

A hotspot for filing a complaint can take many forms, such as a community office, a designated phone number, websites, physical mailboxes, engagement with community liaison officers, and intermediary channels such as unions and NGOs. Enterprises can use several of these to provide a variety of access points at the corporate, project, or site level, as no single access point can meet the needs of all stakeholders.

Grievance mechanisms at the corporate and worker levels, such as complaint lines, grievance processes, workers' committees, or HR channels, should be monitored to verify that people are aware of and trust the processes in place and to verify that they facilitate access to remedy.





Considerations for the design and implementation of a grievance mechanism

A critical point in the design and implementation of community and/or worker grievance mechanisms is to make them accessible (e.g. in terms of language, cost and process) and to be trusted by all relevant stakeholders, such as local community members, including indigenous peoples, women, children and minority groups and workers.

Whatever form these grievance mechanisms and channels take, they must consider the criteria for the effectiveness of the UNGPs (legitimate, accessible, predictable, equitable, transparent, rights-compatible and dialogue-based, as well as being a source of continuous learning). This includes enabling anonymity when necessary and not retaliating in all cases.

Beginning	What it means
Legitimacy	Enable the trust of the stakeholder groups for whose use they are intended and be accountable for the fair conduct of grievance processes.
Accessibility	It is known to all stakeholder groups for whose use they are intended, and provides appropriate assistance for those who may face particular barriers to access.
Predictability	Provide a clear and well-known procedure with an indicative time frame for each stage, and clarity on the types of processes and outcomes available and the means to monitor implementation.
Equity	Ensure that aggrieved parties have reasonable access to the sources of information, advice, and expertise necessary to participate in a grievance process on fair, informed, and respectful terms.
Transparency	Keep the parties to a complaint informed of its progress and provide sufficient information on the performance of the mechanism to build confidence in its effectiveness and satisfy any public interest at stake.
Rights support	Ensure that results and resources are consistent with internationally recognized human rights.
Source of continuous learning	Use relevant measures to identify lessons to improve the mechanism and prevent future complaints and damages.
Based on engagement and dialogue	Consult the stakeholder groups for whose use they are intended for their design and performance, and focus on dialogue as the means of addressing and resolving grievances.





Remediation Process

Where a company has caused or contributed to an adverse human rights impact, it must remedy that impact. Part of human rights due diligence is about deciding which remedy to apply, in consultation with affected individuals, and then implementing the remedy.

However, there are cases where the company itself has not caused or contributed to the damage. The PNRU states "Where adverse impacts have occurred that the company has not caused or contributed to, but are directly linked to its operations, products or services by a business relationship, the responsibility to respect human rights does not require the company itself to provide remediation, although it may play a role in doing so." In this type of situation, the company is not responsible for the remediation; however, the company might, for example, review whether it is possible and appropriate to use influence to advocate and support the remediation.

How the concept of remedy is defined

The Office of the United Nations High Commissioner for Human Rights defines "remedy" as:

- Equitable and effective access to justice.
- Adequate, effective and prompt reparation of the damage suffered.
- Access to relevant information on violations and redress mechanisms.

Examples of remediation

- Provide more information
- Changing operational practices
- Implement disciplinary action
- Restrict activities

- Restoring employment
- Acknowledging and apologizing
- •Correcting inaccuracies in previous company statements
- Cover the cost of legal aid

- Provide medical or psychological care
- Repair damage
- Develop livelihood restoration programs
- Pay compensation
- Non-repetition guarantee





Evidence of human rights due diligence during the remediation process

When some impacts are unavoidable despite a company's efforts to minimize them, it is important to demonstrate that the company is making all reasonable efforts to provide remedies that are appropriate for the people affected.

A remedy depends on the context, severity of impact, and needs of those whose rights have been adversely affected, which should be determined through assessments and meaningful stakeholder engagement.

It must be culturally sensitive, without entrenching social discrimination, and the remedy itself must not cause or contribute to adverse human rights impacts.

Considerations for the Grievance and Redress Stage

The company's complaints and remediation system must be robustly linked to human rights due diligence processes.







Below, we tell you about some of the **channels and mechanisms we currently have in place to properly manage human rights** in our operations.

1. Channels for dealing with cases related to human rights

2. Petitions,
Grievances,
Grievances and
Requests (PQRS)
Mechanism

3. Mechanisms for remediation of cases related to human rights





Channels for dealing with human rights cases

CANALÉTICO

MECANISMO DE PETICIONES, QUEJAS, RECLAMOS Y SOLICITUDES (PQRS)

COMITÉ DE CONVIVENCIA



COMITÉ DE ÉTICA

COMITÉ PARITARIO DE SALUD OCUPACIONAL



Below, y

Channels f

Ethical Channel: Mechanism in which any person can file complaints or complaints, even anonymous, related to fraud/corruption events or conduct contrary to the code of ethics (including those related to human rights). You can communicate via:

- Toll-free telephone line in Colombia: 018000125470.
- Correo electrónico: Canaleticogeb@pwc.com
- Website: <u>www.tgi.com.co</u> ethics and transparency section.



TGI GrupoEnergíaBogotá

COMITÉ DE CONVIVENCIA



COMITÉ DE ÉTICA

COMITÉ PARITARIO DE SALUD OCUPACIONAL

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CANALÉTICO



COMITÉ DE

ÉTICA

Ethics and Compliance Committee: When the Committee becomes aware of possible conduct that violates the provisions of the Code of Ethics, it may decide to conduct an investigation. For more information, please consult the Ethics Channel Manual.



SALUD OCUPACIONAL

COMITÉ PARITARIO DE

E CONVIVENCIA







Below, Channels for dealing wi

CANALÉTICO



Mechanism for petitions, complaints, claims and requests: TGI has channels or means of receiving verbal, face-to-face and virtual petition rights.

In the component "Stop, prevent or mitigate and remedy" we tell you more about these mechanisms that allow you to manage petitions on different issues, including human rights.

*At the end of this content, we will expand information on this mechanism.



TGI GrupoEnergíaBogotá

DE CONVIVENCIA





COMITÉ DE ÉTICA

COMITÉ PARITARIO DE SALUD OCUPACIONAL

Retur -





Below,

Channels for dealing with human rights cases

CANALÉTICO

MECANISMO DE PETIC QUEJAS, RECLAMO SOLICITUDES (PQR



Joint Committee on Occupational Health: Its functions include:

- Investigate the causes of occupational accidents and diseases, proposing corrective measures to prevent their recurrence.
- Inspect health and safety conditions at work.
- Monitor compliance with current legal regulations and the Occupational Health and Safety Management System.
- Promote training activities in Occupational Health and Safety.



GrupoEnergíaBogotá

COMITÉ DE ÉTICA

COMITÉ PARITARIO DE SALUD OCUPACIONAL







Below,

Channels for dealing with human rights cases

CANALÉTICO

MECANISMO DE PETICIONES, QUEJAS, RECLAMOS Y SOLICITUDES (PQRS)

COMITÉ



Coexistence Committee: Its objective is to prevent workplace harassment to protect employees against psychosocial risks that affect their health in the workplace. Also, improve coexistence among all employees and generate actions that strengthen a work environment of well-being and balance.



COMITÉ DE ÉTICA

COMITÉ PARITARIO DE SALUD OCUPACIONAL







Below, Channels for dealing with human rights cases

CANALÉTICO

MECANISMO DE PETICIONES, QUEJAS, RECLAMOS Y SOLICITUDES (PQRS)

COMITÉ DE CONVIVENCIA



COMITÉ DE ÉTICA

COMITÉ PARITARIO DE SALUD OCUPACIONAL







We are almost there! We are going to learn about TGI's human rights management in the last component of Human Rights Due Diligence.



Below, we tell you about some of the **channels and mechanisms we currently have in place to properly manage human rights** in our operations.

! Notes! As a TGI collaborator you will be able to find or need them along the way.

1. Channels for dealing with cases related to human rights

2. Petitions,
Grievances,
Grievances and
Requests (PQRS)
Mechanism

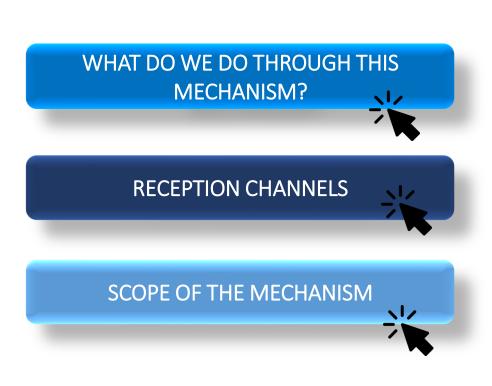
3. Mechanisms for remediation of cases related to human rights



Our Petitions, Complaints, Claims, and Requests Mechanism allows us to be vigilant in **stopping**, **preventing**, **or mitigating human rights impacts** arising from our operations. Let's know what it is about:

Click on each box to learn more about the mechanism:

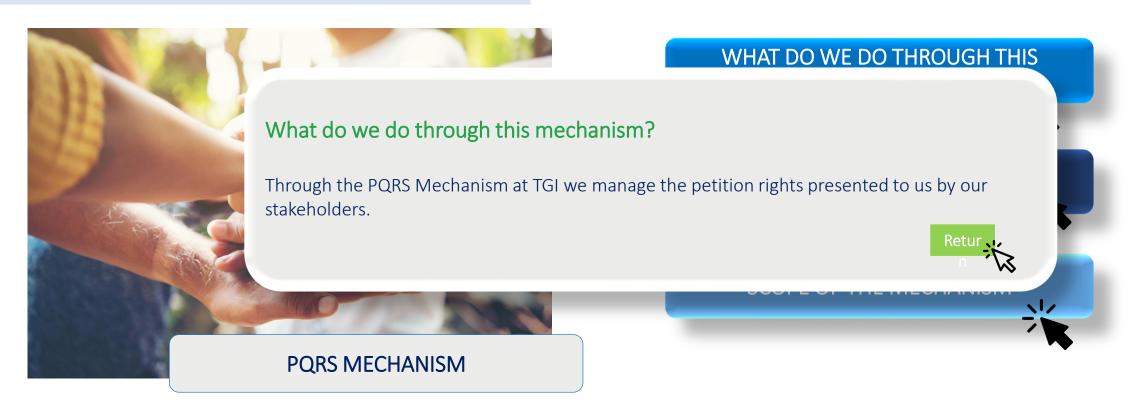






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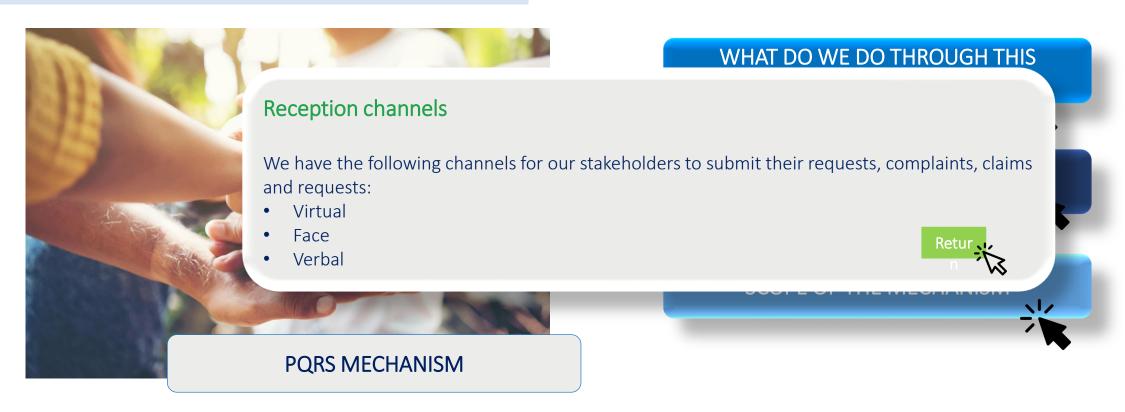
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Click on each box to learn more about the mechanism:



Scope of the mechanism

The process begins with the **reception**, **direction** and **follow-up** of the petition rights by the Directorate of Administrative Services, and goes until the **delivery of the response** to them by agencies and internal collaborators responsible for their attention.

The procedure ends with the analysis of TGI's behaviour in the attention to petition rights, in order to propose actions to improve our internal procedures.





Our Petitions, Complaints, Claims, and Requests Mechanism allows us to be vigilant in **stopping**, **preventing**, **or mitigating human rights impacts** arising from our operations. Let's know what it is about:

Click on each box to learn more about the mechanism:



WHAT DO WE DO THROUGH THIS MECHANISM?

RECEPTION CHANNELS

SCOPE OF THE MECHANISM





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Mechanism

3. Mechanisms for remediation of cases related to human rights









Notes! As a TGI collaborator you will be able to find or need them along the way.

Some of our processes include measures to compensate or remedy cases related to human rights:

Involuntary Resettlement and Relocation Manual

Establishes the actions required for the development of processes of involuntary resettlement and relocation of people who are physically, economically or legally dependent on the intervened properties, as a result of the execution of Projects and/or by the Operation associated with the activity(s) of TGI. In addition, it defines the obligations that TGI will assume in the face of the impacts generated during the process.

Protocol for the prevention of workplace harassment and sexual harassment

Establishes the mechanisms aimed at preventing the conduct referred to in Law 1010 of 2006 and Law 1257 of 2008, in order to prevent and address discrimination and/or workplace violence, in general workplace harassment in any of its modalities and sexual harassment, as well as to promote complaint or denunciation channels to prevent hidden practices from being maintained. ignored or silenced by those who exercise it and by those who suffer them.

