

INTRODUCTION

Based on a pedagogical and participatory compliance model that allows managing risks based on a culture of legality and setting the parameters of defense plans –preventive and reactive– and in accordance with the Code of Corporate Governance¹, the Code of Ethics², the Internal Control and Prevention of Fraud and Corruption Policy³ of Grupo Energía Bogotá (GEB) and its subsidiaries, including Transportadora de Gas Internacional SA ESP (hereinafter, TGI), and the principles of the fight against corruption promulgated in the United Nations Global Compact and Laws 1474 of 2011, 1712 of 2014 and 1778 of 2016, the Ethical Channel is constituted as the instrument through which TGI guarantees the right that all shareholders, administrators, collaborators, contractors and others have. interest groups to report those situations that may eventually be classified as alleged fraud and / or corruption or unethical conduct in TGI, with the purpose of in managing and conducting business in a transparent and sustainable way. Additionally, the Channel allows the formulation of consultations with which it is sought to resolve ethical dilemmas under the guarantee that the Channel is confidential, safe and reliable.

Canal Principles

TGI's Ethical Channel is based on international best practices and is inspired by the following principles:

Dialogical character: This principle is based on instruments of learning, internalization and institutionalization in accordance with a model of pedagogical and participatory compliance in which it is sought to limit, as far as possible, invasive measures that upset the work environment. The Channel is expected to be friendly to the organizational environment and accompany the business as a learning instrument for the corporate citizen who respects the powers attributed to the authorities.

Commitment: For TGI, the eradication and prevention of all acts of fraud, corruption or any conduct contrary to ethics, legality and regulations is a priority, so its administration promotes an ethical culture, in accordance with the highest professional standards and business, in their way of doing business.

Reporter protection: This is the guarantee that TGI grants, to any administrator, collaborator or contractor, that the reports that are received through the Ethical Channel will be confidential and that the identity of the complainants will be protected, to avoid any type of retaliation.

Confidentiality: This is the commitment acquired by TGI that all the information related to preliminary verifications or investigations carried out as a result of the report generated through the Ethical Channel will not be known except by those people who are authorized in the process .

OBJECTIVES

- Detect, through the reports, the existence in TGI of alleged acts of fraud and / or corruption or conduct contrary to ethics, legality and the rules that govern Grupo Energía Bogotá and its subsidiaries, including TGI.
- Investigate, once the respective Preliminary Verification is carried out, any conduct that can be established that, presumably, corresponds to an act of fraud or corruption or that goes against TGI's business ethics.
- Resolve queries about ethical dilemmas presented through the Channel
- Rectify or mitigate the risks detected through the verifications or investigations carried out from the reports made through the Ethics Channel.
- Implement preventive measures, in accordance with the risks evidenced in the verifications or investigations carried out from the reports made through the Ethics Channel.

¹ Approved by the Board of Directors in session of July 30, 2019.

² Approved by the Presidency Committee, in sessions dated May 20 and September 23, 2019.

³ Approved by the Board of Directors, through Act No. 1,575 of May 25, 2017.

1. REACH

Any administrator, collaborator, shareholder, third party of TGI or citizen has the right to report an event of fraud, corruption or any unethical conduct; make inquiries and inform the company, through the Ethical Channel, ethical dilemmas.

2. DEFINITION OF TERMS (N/A)

3. DEVELOPMENT OF ACTIVITIES

4.1. REPORTING BEHAVIORS

Since the Policy for Internal Control and Prevention of Fraud and Corruption is aimed at combating all acts of fraud and / or corruption, through the Ethical Channel, all acts considered as fraud and / or corruption or as conduct may be reported. unethical.

4.2. CHANNEL OPERATING ELEMENTS

- **Reception of the report or query:** This will be processed through the provision of the service of an independent, external and expert third party through the following mechanisms:

1. Free telephone line with a number assigned to each country where the Grupo Energía Bogotá companies are located::

Colombia: 01800-012-5470

Perú: 1800-52-093

Guatemala: 1-800-8350-428

2. Link to the Ethical Channel on the website of each of the Grupo Energía Bogotá companies
3. Mail: canaleticogeb@pwc.com

- **Report Content:** The reporter, at a minimum, must include the following information:
 - Detailed description of the events.
 - Category and typology, as appropriate, according to the drop-down list found in section 4.
 - Optionally, the identification of those presumed responsible for the reported behaviors.
 - The information of the reporter in those cases in which it is about facts related to labor matters; in all other cases, it may be anonymous.
- **Information Management:** The report made through the Ethics Channel is centralized and managed by an independent third party, which forwards said report to the pertinent instances in TGI, so that they can adopt the decisions they consider pertinent in compliance with TGI's policies.
- **Feedback:** The aforementioned instances will inform the reporter, through the Channel, the result of the decision regarding the reported case or the query made.
- **Communication, training and evaluation plan:** TGI has a communications plan that promotes the culture of Zero Tolerance against fraud and corruption; This plan is developed through training, outreach campaigns, among others, by the Compliance Department.

Periodically, the Compliance Department will evaluate and update the Ethics Channel, to ensure that it is properly implemented and works effectively.

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