

## 1. OBJECT

Establish the actions that frame the Human Rights Management of *Transportadora de Gas Internacional S.A. ESP* (hereinafter "TGI SA ESP") in a systematic, articulated, and traceable manner, which is aimed at continuous improvement of the Company's performance in this area.

## 2. SCOPE

This document applies to all departments of TGI S.A. ESP., in accordance with the International Bill of Human Rights, the fundamental conventions of the International Labor Organization - ILO, the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, and the OECD Guidelines on human rights due diligence for Responsible Business Conduct.

TGI S.A. ESP will promote respect for human rights among its collaborators and contractors, as well as the implementation of good practices within the Company.

Within the framework of its relations with other Stakeholders, TGI S.A. ESP will promote respect for human rights to minimize or mitigate adverse impacts on human rights.

## 3. TERMS AND CONDITIONS

**United Nations International Bill of Human Rights:** the cornerstone of human rights is the United Nations International Bill of Human Rights, which consists of three instruments:

- United Nations, Universal Declaration of Human Rights, 1948.
- United Nations, International Covenant on Civil and Political Rights, 1966.
- United Nations, International Covenant on Economic, Social and Cultural Rights, 1966

**Fundamental conventions of the International Labor Organization - ILO:** ILO Conventions (international treaties legally binding for the member States that ratify them) are a set of international labor standards that impose obligations on the States that ratify them. They aim to improve working conditions around the world<sup>1</sup>.

**Human Rights (DDHH):** Faculties, prerogatives, and fundamental freedoms inherent to human beings, the effective exercise of which is essential for the integral development of the individual.

**Due Diligence:** the way the Company becomes aware, avoids, and faces potential and/or real human rights risks arising from its business activities that could infringe the human rights of related social actors.

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<sup>1</sup> The eight fundamental ILO Conventions established by the ILO Governing Body contain the fundamental labor principles and rights considered essential:

ILO Forced Labor Convention, 1930 (No. 29)  
Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)  
Right to Organize and Collective Bargaining Convention, 1949 (No. 98)  
Equal Remuneration Convention, 1951 (No. 100)  
Abolition of Forced Labor Convention, 1957 (No. 105)  
Discrimination (Employment and Occupation) Convention, 1958 (No. 111)  
Minimum Age Convention, 1973 (No. 138)  
Worst Forms of Child Labor Convention, 1999 (No. 182) Text taken from: [https://dhpedia.wikis.co/wiki/Convenios\\_fundamentales\\_de\\_la\\_OIT](https://dhpedia.wikis.co/wiki/Convenios_fundamentales_de_la_OIT)

**GRI Standards:** GRI Standards represent the best practices at a global level for publicly reporting an organization's economic, environmental, and social impacts.

#### **4. SPECIFIC OBJECTIVES**

- 4.1. Define guidelines that govern the internal and external relations of TGI S.A. ESP and ensure due diligence to verify, address and repair the actual and potential effects identified within the framework of respect for human rights.
- 4.2. Strengthen the internal capacities of employees, suppliers, and contractors in human rights matters.
- 4.3. Identify and evaluate the actual or potential adverse effects on human rights that the company may cause through its direct activities, or impacts directly related to operations.

#### **5. INDICATORS**

- 5.1. The existence of policies to respect human rights and mechanisms for evaluation and control; internal disciplinary measures, their due diligence, and remedial actions<sup>2</sup>.
- 5.2. The existence of actions to prevent child labor and/or forced labor in company operations<sup>3</sup>.
- 5.3. The existence of actions for the selection and contracting of suppliers, contractors, or distributors based on respect for human rights and the use of mechanisms to identify negative social impacts<sup>4</sup>.
- 5.4. The existence of training activities in human rights policies and procedures for personnel, including security personnel<sup>5</sup>.
- 5.5. The existence of actions to prevent violations of the rights of indigenous peoples<sup>6</sup>.
- 5.6. The existence of actions to respect the civil, political, economic, social, and cultural rights of all individuals<sup>7</sup>.

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2 Relevant G4 indicators - Human Rights Aspect: HR1

3 Relevant G4 indicators - Human Rights Aspect: HR4

4 Relevant G4 indicators - Human Rights Aspect: HR5

5 Relevant G4 indicators - Human Rights Aspect: HR6

6 Relevant G4 indicators - Human Rights Aspect: HR7

7 Relevant G4 indicators - Human Rights Aspect: HR10

5.7. The Existence of actions to avoid complicity in human rights abuses due to governmental or social practices<sup>8</sup>.

## 6. COMPONENTS OF THE HUMAN RIGHTS MANAGEMENT SYSTEM MANUAL

To comply with national and international standards on human rights, that TGI SA ESP has established, as part of the management system manual in this subject, the following elements:

### 6.1. TGI S.A. ESP Human Rights Policy

Through its human rights policy, TGI S.A. ESP establishes the principles, guidelines, and commitment to human rights aligned with the scope of this document.

Annex 1. TGI S.A. ESP Human Rights Policy

### 6.2. External Due Diligence in Human Rights: TGI S.A. ESP Management Diagnosis (*Baseline*).

The company analyzed the current human rights management system, carrying out a first external due diligence analysis that allowed establishing the management diagnosis, the gaps to be covered, and the action plan to address them.

The result of the first due diligence analysis is reflected in the document ***“Human Rights Management, Human Rights Risk Analysis and Action Plan”*** which is an integral part of the Management System as a Baseline in this subject, in which the relevant management risks, actions to close gaps, and those responsible for their execution are identified.

Annex 2. Human Rights Management, Human Rights Risk Analysis and Action Plan

As international standards require, it will be necessary to perform an external due diligence diagnosis every three (3) years through a specialized consultant with sufficient expertise on the subject, who verifies the company's management and the progress regarding the gap analysis and action plan.

### 6.3. Internal Human Rights Due Diligence Procedure

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<sup>8</sup> Relevant G4 indicators - Human Rights Aspect: HR11

An internal annual due diligence procedure establishes the practical methodology for managing human rights in a systematic, articulated, verifiable, and continuous analysis way. In addition, this annual procedure aims at improving the organization's performance in this subject, based on a yearly self-diagnosis of the different areas concerned.

This procedure is composed of the following documents:

Annex 3. Annual Due Diligence Procedure - TGI S.A. ESP Human Rights Action Plan

Annex 4. TGI S.A. ESP Impact Analysis Matrix and mitigation measures on human rights

Annex 5. Analysis of risks and human rights impacts in specific projects or operations (pending - under construction)

## **6.4. Complaint and Reparation Mechanisms**

### **6.4.1. Complaint Mechanisms**

This mechanism adopts and applies the policies and processes necessary to guarantee that the personnel involved in the processing of complaints are aware of:

- i) The rights and needs of the people for whom the mechanism is intended (adopting a gender perspective and paying particular attention to those who may be at greater risk of vulnerability or marginalization);
- ii) Social, economic, structural, and cultural issues that may affect the ability of the mechanism to meet those needs;
- iii) How different sources of discrimination can combine to exacerbate inequalities in society;
- iv) The treatment of rights holders is culturally appropriate and correct.

Based on the above, the existing and accessible mechanisms for the receipt of petitions, complaints, and claims allow resolving in a timely, transparent, and efficient manner the requests of those who consider themselves affected in their human rights by the company's operational activity. The means provided by TGI S.A. E.S.P., for the petitioners to present rights to petition are listed in the Channels for Receiving Rights of Petition format.

Annex 6. Channels for Receiving Rights to Petition

TGI S.A. ESP recognizes that access to the channels for receiving rights to petition is not a condition or obstacle for those who feel affected to resort to the mechanisms available to the State to attend to their requests, complaints, and claims.

### **6.4.2. Complaint Mechanisms (Rights to Petition)**

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Procedure P-AJU-018 establishes the mechanisms that TGI SA ESP has, to receive requests, claims, and opinions from the different internal or external interest groups, which includes criteria for identifying the incidence of requests, complaints, or claims regarding human rights.

Annex 7. Procedure P-AJU-018 Complaint Mechanisms Procedure (proposed update Attention of Rights to Petition)

On the other hand, there are the following instances to consider any fact that violates Human Rights related to suppliers, contractors, or collaborators, such as:

- Ethics and Compliance Committee,
- Labor Coexistence Committee,
- Joint Committee on Occupational Health

#### **6.4.3. Ethical channel**

The Ethical Channel is a mechanism managed by a third party in which anyone can file complaints or even anonymous complaints related to fraud/corruption events or conduct contrary to the code of ethics through the free telephone line in Colombia: 018000125470, Email-address: [Canaleticogeb@pwc.com](mailto:Canaleticogeb@pwc.com) and website: [www.tgi.com.co](http://www.tgi.com.co) ethics and transparency section.

The M-GEG-008 Ethical Channel Manual establishes that when the Ethics and Compliance Committee is aware of possible behaviors that violate the provisions of the Code of Ethics, it can decide to carry out an investigation.

#### **6.4.4. Workplace harassment and Sexual harassment**

There is also procedure P-GTH-026 Management of Cases of Presumed Workplace Harassment and Sexual Harassment, which defines the activities that must be performed to treat complaints of alleged workplace or sexual harassment effectively.

#### **6.4.5. Reparation Mechanisms**

As part of the duty to protect against human rights violations related to business activity, TGI takes appropriate measures to manage and guarantee effective and efficient reparation mechanisms and actions in human rights matters through proper administrative procedures or other available means.

As required by international standards and the United Nations Guiding Principles on Human Rights and Business and based on the OECD Due Diligence Guide for Responsible Business Conduct, the procedure for reparation mechanisms is established with a focus on human rights.

Annex 8. Reparation Mechanisms Procedure

On the other hand, Manual M-ASI-044 establishes the actions required for the development of Involuntary Resettlement processes and Relocation of Social or Productive Units, as a consequence of the execution of Projects and/or by the operation associated with the activity (s) of TGI S.A. ESP, as

well as the definition of obligations that it will assume for the impacts that are generated during the process.

The effectiveness of the reparation mechanisms must be evaluated annually in the annual due diligence exercise and every three years under the provisions of point 6.2., and they must be adjusted to the particular circumstances of the communities that make the claims to address each case under the principles of interculturality and differential approach, with the understanding that there are several impacted population groups:

- Children
- Women
- People with physical or cognitive disabilities
- Seniors
- Population or ethnic groups

#### Annex 9. Manual of Involuntary Resettlement and Relocations

On the other hand, TGI S.A. ESP implemented the Disaster Risk Management Plan for Public and Private Companies - PGRDEPP, that meets the commitment to perform healthy, safe, and environmentally responsible operations, that "manage early and under the precautionary principle, the risks, impacts and opportunities that may be generated in environmental, social and occupational health and safety matters derived from our operation."

### **6.5. Promotion of Human Rights**

TGI has the necessary resources to carry out the promotion, dissemination, and training of its collaborators, contractors, or other interest groups, which facilitates understanding human rights, knowledge of these, and the adjustment of the organizational culture in favor of their observance.

#### **6.5.1. Activities aiming to promote human rights are:**

Procedure P-GTH-012 for education and training establishes the guidelines to identify and strengthen the competencies of TGI employees and enhance their development process by contributing through various tools.

Annually the Sustainable Development Management and the Human Resources Management will design the training plan in this subject.

Contractors and suppliers are trained to assimilate and respect human rights through induction, reintroduction, talks, or corporate events, among others.

For the socialization of the Human Rights Management System Manual, a communication plan will be designed and implemented through the different internal and external communication media, framed in

the Communications Manual M-GEG-002, so that the various interest groups are aware of the management carried out by the COMPANY.

**6.6. Human Rights Management with suppliers and contractors**

In the conditions established on the bidding processes, it is requested that the bidders include the Offer Presentation Letter and other statements signed by the legal representative as an integral part of their offers at the time of their submission. In addition, the acknowledgment of understanding of Corporate Policies, TGI's Human Rights Policy, and the Ten Universal Principles of the United Nations Global Compact must be included.

Once the contracts and agreements are signed, the Manual M-ASI-002 HSEQ and Social for contractors and suppliers will be an integral part of them. In M-ASI-002, compliance with the Human Rights Policy is established, and reference is made to respect for human rights, sustainable development objectives, and gender equality as part of the issues to be considered in the execution of the activities.

Additionally, the contractual clauses will include another clause that expresses the commitment to comply with human rights performance and measures to apply in case of behaviors that do not comply with the established in the Human Rights Management System Manual and the Human Rights Policy of TGI SA ESP.

One of the control actions applied with suppliers and contractors will be the inclusion of evaluation aspects in the contracting processes that promote the selection of contractors who do not have a previous sanction record of human rights violations.

Finally, the identification and management of human rights impacts of TGI's supply chain, identified as critical in the supply matrix, will be performed every 3 years.

**6.7. Human Rights Attention Scheme**

As previously mentioned, in the Company, all areas and collaborators are responsible for respecting and promoting human rights. Consequently, it is the general scheme of attention to human rights that the organization must follow within the framework of its operation (non-exhaustive list).

It should be noted that the procedures for the assurance of Human Rights listed below will be managed by the responsible areas together with the areas that they consider pertinent:

Human Rights	Responsible Area(s)
<b>Labor Rights</b> -Right to Favorable Working Conditions -Child Labor Prevention	Human Resources Management

<ul style="list-style-type: none"> <li>-Right to Organize</li> <li>-Right to Non-Discrimination</li> <li>-Right to social security</li> <li>-Right to a Free and Decent Work</li> <li>-Right to work</li> </ul>	
<p><b>Security</b></p> <ul style="list-style-type: none"> <li>-Right to Life and Physical Integrity</li> </ul>	Administrative Services Directorate Sub directorate SST
<p><b>Environment</b></p> <ul style="list-style-type: none"> <li>-Right to a healthy environment</li> </ul>	Environmental Sub directorate Human Resources Management
<p><b>Economic and Social Rights</b></p> <ul style="list-style-type: none"> <li>-Right to an adequate standard of living</li> </ul>	Human Resources Management Social sub directorate
<p><b>Civil and Political Right</b></p> <ul style="list-style-type: none"> <li>-Right to vote</li> <li>-Right to Peaceful Protest</li> </ul>	Human Resources Management GDS- Social Sub directorate Administrative Services Directorate
<p><b>Rights of Ethnic Groups</b></p> <ul style="list-style-type: none"> <li>-Right to Autonomy and Self-determination of the Peoples</li> <li>-Right to Free, Prior and Informed Consultation</li> <li>-Territorial Rights</li> </ul>	GDS- Social Sub directorate Legal Proceedings Directorate
<p><b>Ethics and Transparency</b></p> <ul style="list-style-type: none"> <li>-Fight against Corruption, Bribery Requests, and other forms of Extortion</li> <li>-Disclosure of Information and Tax Issues</li> </ul>	Compliance Directorate

All the aforementioned areas will be responsible for completing the **Annual Human Rights Action Plan**, which is part of the annual due diligence exercise that each area will develop and that must be subject to permanent monitoring by those responsible. In addition, the due diligence on the current human rights management and the gaps or actions to be taken to comply with and respect human rights, will also be recorded.

The **Human Rights Impact Analysis Matrix** is the tool that will be used to perform the self-diagnosis of each area in case of generation of possible impacts and the management measures proposed to mitigate or remedy the effects that are effectively generated.

Annex 10. Annual Action Plan on Human Rights

Annex 11. Human Rights Impact Analysis Matrix

## **6.8. Resources and capacities for the implementation of the Human Rights Management System Manual**



TGI SA ESP will include the approval of resources to continue implementing the human rights management system within the annual budget.

Each area must ensure the inclusion of resources to fulfill its human rights responsibilities, understanding that, although the leadership in the implementation of the policy is at the head of the GDS, each area is committed to complying with this policy and must comply with the actions under its charge.

### **6.9. Responsible for the Human Rights Management System Manual**

The respect and promotion of human rights is a commitment of the entire organization. However, this Manual of the Human Rights Management System will have the following levels of particular responsibility:

**6.9.1. Corporate Governance, Sustainability and Human Resources Committee:** Approve the Human Rights Policy and guide, supervise, and control the Human Rights Management System Manual implementation and action plans. In general, monitor at least annually the management of the company in matters of Human Rights.

**6.9.2. Executive Committee:** Promote the commitment and respect for human rights within the organization and all company areas and evaluate compliance with the annual action plan every six months.

**6.9.3. Sustainable Development Committee:** Monitor compliance with the Human Rights Policy, formulate recommendations for updating it, present proposals or observations that allow improving the indicators of human rights compliance, and review or recommend the cases or associated situations related to human rights.

**6.9.4. Vice presidencies and Directorship:** ensure the alignment of its internal processes with the commitment to respect and promote human rights as part of the missionary activities of each area.

**6.9.5. Sustainable Development Management:** Implement and monitor the Human Rights Management System Manual. Guide, coordinate, and control the plans for the implementation of the Policy by the areas of the Company and evaluate it periodically to establish its relevance and functionality, making the necessary adjustments if required.

**6.9.6. Human Resources Management:** It is responsible for implementing the training plans and training of employees and the matters related to this document.

**6.9.7. Legal and Services Vice Presidency:** Ensure that the Company has guidelines for handling claims and reparation mechanisms in the event of a violation of human rights. These mechanisms meet the following criteria:

- They have guidelines and processes to determine when a claim or case must be resolved, considering, but not limited to, the following resolution categories:
  - Symbolic remedy
  - Economic compensation
  - Restoration of the right
  - Administrative sanctions

It includes guidelines and processes to determine when a claim or case should be resolved, taking into account the following considerations:

- Establish alliances with authorities for the adequate provision of remedies.
- Integrate the expectations of the affected person (s) in the process of defining resolution measures.

**6.9.8. Operational Supply Management:** It is responsible for the activities for the deployment of the Human Rights Policy in the processes of purchasing goods and services and the inclusion of the commitment of respect and due diligence in Human Rights by the contractors and suppliers of TGI SA ESP.

**6.9.9. Communications Sub-directorate:** Communicate and disseminate the Human Rights Policy and the steps taken in due diligence on Human Rights through the appropriate means to know it at all levels of the organization and stakeholders.

**6.9.10. TGI employees:** They are responsible for adopting and complying with the Human Rights Management System Manual and the Human Rights Policy.

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