



Internal Control

Policy and prevention of fraud and corruption



TGI
Grupo Energía Bogotá





PURPOSE AND SCOPE

Establish the commitments of the companies that make up Grupo Energía de Bogotá (hereinafter “GEB” or “the Group”) for the adoption and maintenance of a System of Internal Control that allows the achievement, in an orderly and efficient manner, of the objectives, management and results of the Group companies, through the implementation of standards and procedures aimed at fulfilling said work; as well as the promotion and consolidation of an ethical culture based on the corporate values of transparency, fairness, respect and integrity; and the establishment of guidelines that allow identify, detect, assess, mitigate, monitor, investigate, prevent and correct risks of fraud and corruption that may occur within the companies that make up Part of the group.

DECLARATIONS OF COMMITMENT

- 1. Establish and update an efficient and effective Internal Control System (“ICS”)**, through the implementation of best practices in this area, in accordance with the ICS model adopted by the Group, carrying out preventive control activities, corrective and detection processes, in harmony with the needs and operations of the companies that make up the Group.
- 2. Abide by and respect the regulations** applicable to the companies that are part of the GEB and accept as main criteria the components of the Control System aligned with the “COSO” model.
- 3. Assume a position of "Zero Tolerance" to fraud, money laundering and financing of terrorism and any act of corruption**, which entails the adoption of the necessary measures to implement the guidelines to prevent and combat such conduct, such as the design and implementation of compliance programs.
- 4. Promote a culture of transparency**, which integrates the different risk management systems aimed at the identification, detection, evaluation, mitigation, monitoring, investigation, prevention and correction of conduct related to fraud, money laundering and financing of terrorism and corruption, as well as the strengthening of the Internal Control System.
- 5. Have an Ethical Channel**, as an official means to receive complaints related to cases of fraud, money laundering, corruption or any other illegal conduct, as well as infractions of the Code of Ethics and resolve queries and ethical dilemmas that may arise. obliged to comply with the Policy (the “Responsible”). For the above, it will process and guarantee confidentiality regarding all complaints or queries received in the Ethical Channel, regardless of their amount or persons.

6. Adopt measures to prevent any whistleblower from being subjected to retaliation for have reported violations of the Policy.

Policy Makers

Administrators, collaborators at management level, employees, shareholders, entities internal controls of the companies that make up the Group, as well as contractors and clients, as the case may be, are responsible for compliance with the guidelines for the prevention of fraud, money laundering and financing of terrorism and corruption, as well as the proper functioning of the Internal Control System.

Managers and collaborators at management level are also responsible for giving Know all employees under your direction, the rules, procedures and protocols that must be observed to prevent and mitigate the risk of fraud and corruption, as well as apply the necessary controls to prevent the companies that make up the Group, or its employees engage in or condone such conduct.

The Internal Audit Department and employees at management level are responsible for disclose this policy.

To ensure compliance and preserve the integrity of the Internal Control System in GEB companies, they will apply the Three Lines of Defense model, according to the standard promoted by the European Confederation of Institutes of Internal Auditing (ECIIA) with which the responsibilities are defined before the Internal Control System, in the following terms:

- In the first line of defense, top management control is exercised through the owners. processes, who establish their own control activities (Self-control) to mitigate its risks and maintain effective internal control.
- The second line of defense is framed in the different functions of supervision and monitoring, carried out by the areas that carry out reporting control activities financial, legal and regulatory compliance, quality management systems, security of information, supervision and inspection and risk management, where it is facilitated and monitored the implementation of control activities to mitigate risks. This line ensures that the first line of defense is operating as it was established.
- The third line of defense corresponds to independent insurance, through the internal and external audit activities. This line of defense provides corporate governance bodies and senior management reasonable assurance on the effectiveness of corporate governance, risk management and control, through the independence and objectivity in the companies that form part of the Group.