

# CODE OF ETHICS AND CONDUCT OF SUPPLIERS AND CONTRACTORS

TGI

*Mejoramos vidas*



Grupo Energía Bogotá

**Energía para  
con energía prosperar**

*sostenible y competitiva*

# Content

Message from Presidency	1
Scope and compliance	2
General guidelines	3
1. Ethics and corporate values	3
2. Duties and Obligations of Suppliers and Contractors	5
3. Fraud, Corruption and Transnational Bribery Prevention	6
4. Gifts and hospitality	7
5. Conflicts of interest	8
6. Prevention of Money Laundering, Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction	9
7. Processing of Personal Data	10
8. Information management	11
9. Sustainability	12
9.1 Human rights	13
9.2 Labor standards	14
9.3 Environmental protection and care	15
10. Ethics channel	16
11. Penalties for non-compliance	17
Definitions	18
Acceptance of Supplier or Contractor	19

# Message from Presidency

Grupo Energía Bogotá, in the development of its higher purpose, has an unwavering commitment to integrity, legality, ethics, and transparency in each of its actions as a business group.

As companies and individuals, we have a permanent relationship with our Stakeholders based on constant and effective communication based on our corporate values. Likewise, we also adopt and honor a zero-tolerance stance towards any unethical and/or illegal conduct, particularly Fraud, Money Laundering, Financing of Terrorism, Financing of the Proliferation of Weapons of Mass Destruction, Corruption, and Transnational Bribery, among others.

We are a Business Group that improves lives with sustainable and competitive energy, contributing to the economic, social, and environmental prosperity of its Stakeholders and the countries in which it operates through the work of a committed, transparent, innovative, efficient, and empathetic team.

Our Suppliers and Contractors are fundamental in achieving our higher purpose, respecting our corporate values, and the effectiveness and transversality of our commitment to comply with the highest standards of integrity, legality, ethics, transparency, and professional and human quality.

This Code of Ethics and Conduct for Suppliers and Contractors defines the guidelines and minimum standards that all our Suppliers and Contractors must respect and comply with responsibly, in all their interactions with TGI and GEB and with their other Stakeholders. This is the only way to build solid, sustainable, transparent commercial relationships based on trust, respect, and the highest ethical and regulatory standards. This will allow us to obtain quality results that will undoubtedly contribute to the institutional, economic, and social strengthening of the regions where we operate.

I invite you to give life to this document in each of your actions and interactions, when making decisions, your daily work, and your life in general, with coherence and integrity.

## Scope

This Code of Ethics and Conduct for Suppliers and Contractors is a normative and consultation document of mandatory compliance for all Suppliers and Contractors of TGI and GEB, whatever it may be, including, if applicable, their parents, subsidiaries, and/or affiliates, as well as TGI and GEB's collaborators who have within their functions to perform the contracts to be signed with contractors and to ensure compliance with these within TGI and GEB.

Suppliers and Contractors must adopt, honor, and disclose this Code of Ethics and Conduct for Suppliers and Contractors with their employees and subcontractors, effectively verifying its communication and compliance.

## Compliance

Suppliers and Contractors must fully comply with all laws, good business practices, business ethics, and contractual provisions, as well as with the parameters detailed in this Code. Likewise, they must comply with the provisions contained in the other TGI and GEB compliance and good practices rules, policies, and procedures, including, but not limited to: the Code of Ethics, the Internal Control and Fraud and Corruption Prevention Policy, the SIPLA Manual, the Human Rights Policy, the Policy for the Treatment of Personal Data, the Information Security and Cybersecurity Policy and/or the Information Security and Privacy Model (MSPI, from its Spanish initials), confidentiality agreements, among others.

The knowledge, socialization, and acceptance of this Code of Ethics and Conduct for Suppliers and Contractors is a prerequisite for the execution of all contracts, agreements, legal business, and other documents signed between TGI and GEB and the Suppliers or Contractors. In the case of Suppliers and Contractors who are unable to accept this Code and who have their own compliance politics must submit them so that TGI and GEB can evaluate them through the Compliance Department.

The standards of this Code of Ethics and Conduct for Suppliers and Contractors do not replace but are in addition to, the provisions of any contract, agreement, or document between TGI, GEB, and Suppliers or Contractors.

TGI and GEB reserve the right to verify compliance with the Code of Ethics and Conduct for Suppliers and Contractors through internal or external evaluation mechanisms, in which we expect the support and willingness of Suppliers and Contractors.



# 1 Ethics and corporate values

This Code of Ethics and Conduct for Suppliers and Contractors is based on TGI and GEB's corporate values, which define the expected behavior for each of our Suppliers and Contractors:

## Life First

It is the most important value because it teaches us to take care of ourselves and the people around us, ensuring that everyone gets home unscathed at the end of the day.



## Integrity

It is the value that allows us to act in a coherent, straight, honest, fair, and objective manner; it is the component that leads us to act transparently before TGI and GEB, and all our Stakeholders, to meet our objectives.



## Teamwork with individual responsibility

It invites us to work collaboratively, communicating constantly and building trust. It reminds us that we all have a specific mission, which, when united with the task of others, produces extraordinary results.



## Focus on results

It reminds us of the importance of working focused to achieve the expected results, and thus make our company a sustainable organization in time, which delivers to the society.



## Empathy

This value teaches us the importance of respecting the viewpoints of everyone, without discrimination or bias against beliefs, race, ideologies, and other factors, so that we can elevate our humanity every day.



**Energía para prosperar**



In addition, Suppliers and Contractors must act under the following ethical principles during all stages of the relationship with TGI and GEB, pre-contractual, contractual and post-contractual:

### **Transparency:**

It refers to performing management in an objective, clear, and verifiable manner, as early as submitting bids in the contracting processes in TGI and GEB.

### **Respect:**

It refers to interacting in recognition of collective interests, individual diversity, sustainability of natural resources, and institutionality.

### **Equality:**

It refers to acting with fairness and impartiality, seeking a positive and inclusive social impact.

### **Good Faith:**

It refers to acting in the pre-contractual, contractual and post-contractual relations with TGI and the GEB in good faith.

### **Legality:**

It refers to the development of business activities subject to applicable laws, rules, and regulations, as well as to the conditions agreed upon in the contracting processes and the contracts or agreements signed with TGI and the GEB.

### **Responsibility:**

It refers to making the highest and best effort to achieve business objectives in compliance with applicable laws, rules, and regulations in force, as well as to guarantee the quality of the goods and/or services and to be accountable for them.

## 2

# Duties and obligations of the Suppliers and Contractors

The following are the duties and obligations of all Suppliers and Contractors, which must be fully observed and complied with within the framework of any commercial and/or contractual relationship with TGI and the GEB:

Formulate bids or offers with fair values.

Refrain from formulating offers with artificially low prices or violating good and healthy competitive practices.

Refrain from delivering false, inaccurate, or misleading information

Ensure abiding copyright, intellectual property, information security, personal data protection, and other internal and external regulations that must be complied with.

Act in good faith, loyalty and collaboration, meaning to provide information that should be known by TGI and the GEB in relation to the execution of the contracts or related to any other kind of information that may be of interest to TGI and the GEB and affect their reputation.

Report through the means established for this purpose (Ethics Channel), any situation that could be considered or constitutes a conflict of interest, whether personal, family, or economic.

Report through the ethics channel any situation that may involve a violation of the ethical, legal, and regulatory framework of TGI and GEB, such as violations of the code of ethics and conduct, and other policies, illegal or unethical conduct, and violation of internal procedures, among others.

# 3

## Prevention of Fraud, Corruption, and Transnational Bribery

TGI and GEB are committed to a zero-tolerance policy against Fraud, Corruption, and Transnational Bribery.

Due to the above, TGI's and GEB's Suppliers and Contractors must have policies, rules, or internal guidelines that allow them to identify, detect, evaluate, mitigate, monitor, investigate, prevent, manage, control, and correct the risks of Fraud, Corruption, Transnational Bribery, and in general any unethical and/or illegal conduct in the development of its economic and contractual activity, and specifically in its relations with TGI and the GEB, under the applicable national and international regulations, such as Law 2195, the Foreign Corrupt Practices Act (FCPA), the OECD Anti-Bribery Convention, United Nations Conventions, among others.

### At a minimum, Suppliers and Contractors must:

Guarantee ethics, transparency, legality, and good faith in its actions and business, as well as in the development of its activities and operations.

Guarantee that the money or resources received from TGI and GEB within the framework of the respective relationship will be used solely and exclusively for lawful activities.

Implement pertinent actions to detect, prevent, control, and manage events of Fraud, Corruption, and Transnational Bribery.

Mitigate legal, operational, reputational, and economic risks arising from events or activities associated with Fraud, Corruption, and/or Transnational Bribery.

Immediately report to TGI any event of Fraud, Corruption and/or Transnational Bribery through its Ethical Channel.

Refrain from the offering, granting, promising, accepting, insinuating, receiving, or requesting to TGI and GEB Collaborators or national or foreign public officials, an undue advantage of any value either in money or in kind, directly or indirectly, for their benefit or that of a third party.

Refrain from delivering and/or promoting Facilitation Payments in the relationship with its counterparties.

To guarantee and respect free business and economic competition, avoiding practices such as collusion, restrictive practices, or cartelization, among others.

Manage its accounting in a safe, reliable, and systematized manner, complying with the applicable laws and regulations in force, ensuring that the accounting records truthfully and reliably reflect the financial reality.

Perform due diligence and knowledge of counterparties to each subcontractor that is linked to the Supplier and/or Contractor, promoting contracting with counterparties that are not linked to investigations or with reputational impacts related to acts of Corruption and/or Bribery.



In case of lacking their own policies, standards, or guidelines for the prevention and control of Fraud, Corruption, and Transnational Bribery, or if these are insufficient within the framework of the relationship with TGI and GEB, Suppliers and Contractors must adhere to TGI/GEB's internal policies and standards related to this matter, highlighting that in case of discrepancy between one standard and another, priority must be given to the observance and applicability of TGI/GEB's standards.

***In any case, in TGI and GEB, facilitation payments and lobbying expenses are expressly prohibited.***

## 4

# Gifts and hospitality



TGI and GEB Suppliers and Contractors are prohibited from offering, granting, promising, accepting, insinuating, receiving, or requesting gifts and hospitalities to TGI and GEB Collaborators, except for promotional items intended for image positioning and brand recall, which are reasonable for such purpose and do not exceed a maximum value of USD 30 or its equivalent in other currencies (including, but not limited to: pens, diaries, calendars, umbrellas).

Suppliers and Contractors may invite TGI and GEB's Administrators and Collaborators to events and/or celebrations, and for them to accept, they must follow the internal procedure defined for these situations. In addition, Suppliers or Contractors, as the case may be, will not be able to cover travel, lodging, and per diem expenses, if required, which shall be assumed by TGI or the GEB.

Suppliers and contractors must refrain from (a) making invitations to events that are not related to the contractual, social, and/or economic purpose of TGI and the GEB, for example, theater plays, tourism trips, places where women or men are used as an element of distraction or in a denigrating manner, among others, (b) that have as their purpose any demand, consideration or that may represent a potential conflict of interest, (c) cash or equivalent, such as bonuses, (d) any attention that is perceivable or reprehensible from the transparency and morality of good business practices.

In any case, contractors and suppliers must fully observe and comply with the policy and guidelines for gifts and hospitality of TGI and GEB.

# 5

## Conflicts of interest

TGI and GEB's Suppliers and Contractors are in a conflict of interest situation when their independent and objective judgment is limited, having to choose when making decisions between TGI/GEB's interest and their own, a third party's or a related party's interest. Suppliers and Contractors must act in good faith, with transparency and correctness, and impartially during the performance of the contractual obligations and the functions entrusted to them, which means that they must refrain from incurring in conflicts of interest.

In any case, TGI and GEB expect Suppliers and Contractors to evaluate and report immediately, through the Ethics Channel, any real or potential conflict of interest situation in which they are or may become involved, as well as those of which they become aware in the framework of their relationship with TGI and/or GEB.

These conflicts are defined as follows:

### Personal conflict of interest:

There is a personal conflict of interest when objectivity and independence are distorted by a relationship or potential relationship with persons who are or have been close to, but with whom there is no blood, affinity, or civil relationship.

For example, former co-workers, classmates, childhood friends, godparents or godmothers of marriage or children, among others.

### Family conflict of interest:

It occurs when our objectivity and/or independence is distorted by a relationship, or potential relationship, with relatives below the fourth degree of consanguinity, third of affinity, first civil relationship or with our spouse or permanent partners, as follows:

#### Consanguinity

**First degree:**

Parents and children

**Second degree:**

Siblings, half-siblings, grandparents and grandchildren

**Third degree:**

Uncles and nephews

**Fourth degree:**

Cousins

#### Affinity:

**First degree:**

In-laws and sons-in-law or daughters-in-law.

**Second degree:**

Spouse's siblings, Spouse's brothers-in-law and sisters-in-law, and grandparents-in-law

**Third degree:**

Spouse's aunts, uncles, cousins, and great-grandparents

#### Civil relationship:

Adoptive parents and adoptive children

### Economic conflict of interest:

An economic conflict of interest, whether potential or actual, arises when we are faced with relationships with individuals or legal entities with whom we have or could have some prior relationship of a patrimonial nature.

For example: Linking to GEB as a supplier a company of which I am a legal representative, shareholder, board member, or other, accepting to be an external advisor of a company that has links with TGI/GEB, or being an auditor and/or supervisor of contracts in which I have an economic interest, among others.

# 6

## Prevention of Money Laundering, Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction

TGI and GEB Suppliers and Contractors shall have internal policies, standards, or guidelines that allow them to prevent, mitigate, control, and manage the risks associated with Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction, following the regulations applicable to the exercise of their economic activity.

At a minimum, Suppliers and Contractors must:

Guarantee that the money or resources received from TGI and/or GEB within the framework of any contractual or commercial relationship will be used solely and exclusively for lawful activities.

Design and implement procedures to get to know their respective counterparts and their Final and/or actual Beneficiaries.

Implement the pertinent actions to detect, prevent, control, and manage events and/or suspicious operations of Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction.

Mitigate legal, operational, and economic risks derived from events or activities associated with Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction.

Report any event of Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction to GEB through the Ethics Channel.

Ensure proper knowledge of counterparties, through fully defined due diligence procedures, and implementing enhanced due diligence measures towards PEPs.

Execute basic due diligence and enhanced due diligence mechanisms according to the level of risk that each counterparty represents.

Design and implement monitoring mechanisms for its counterparts.

Communicate and justify to TGI and/or the GEB the need to subcontract any type of service or activity included in the contract signed with TGI and/or the GEB.

Perform due diligence and knowledge of counterparties to each subcontractor that is linked to the supplier and/or contractor, promoting contracting with counterparties that are not linked to national or international restrictive lists or associated with money laundering, financing of terrorism, or associated crimes.

In case of not having their own policies, standards, or guidelines for the Prevention and Control of Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction, or in case these are insufficient within the framework of the relationship with TGI and GEB, Suppliers and Contractors shall adhere to the SIPLA Manual, which is published on TGI's web page and can be consulted in the following link:

<https://www.tgi.com.co/nosotros/programa-de-etica-y-cumplimiento>

# 7 Processing of Personal Data

In the development of relations with TGI and GEB, Suppliers and Contractors must comply with TGI's Personal Data Treatment Policy and the applicable regulations on the matter.

The main objectives of TGI's Personal Data Treatment Policy are:

To regulate the collection, storage, use, circulation, suppression, transfer, and transmission of personal data carried out by TGI.

To guarantee that the holders of personal data may know, include, update, rectify, delete, and revoke the authorization regarding the personal information processed by TGI.

To establish the guidelines that guarantee the protection of personal data processed by TGI as the responsible party.

To ensure that Suppliers and Contractors give full compliance for the fulfillment of the processing of personal data.

To handle with the strictest confidentiality and reserve the personal data of which they have the knowledge, only being able to disclose it in the cases strictly indicated by law.

To report any security incident related to the exposure of personal data held in custody.

TGI's Personal Data Processing Policy is permanently published on TGI's website and can be consulted at <https://www.tgi.com.co/datos-personales>.

The foregoing is without prejudice to the fact that Suppliers and Contractors have internal policies, standards, or guidelines that regulate the matter.

# 8

## Information management

All information generated within the framework of relations with Suppliers and Contractors is considered a valuable asset, so its protection is of vital importance. Therefore, TGI and GEB expect Suppliers and Contractors to take all appropriate measures to safeguard and handle properly and confidentially the information they become aware of in the framework of the relationship with TGI and GEB.

By way of example, Suppliers and Contractors are prohibited:

To publish, without prior and express authorization, in whole or in part, the information that they know within the framework of their relations with TGI and GEB.

Use the information that they have knowledge of within the framework of its relations with TGI/GEB for its own benefit or that of a third party, to the detriment of TGI/GEB.

Use the information that they have knowledge of within the framework of its relations with TGI/GEB to commit unethical, unlawful, and/or criminal conduct.

Suppliers and Contractors must refrain from using privileged and/or confidential information for purposes other than those expressly indicated in the respective contracts or agreements with TGI/GEB. Likewise, they must keep confidentiality in relation to negotiation processes, contractual processes, commercial relations, presentation of offers, and operations in the securities market, among others.

In case they are required by any national or foreign authority, in relation to any contract they have with TGI and/or GEB, Suppliers and Contractors must immediately inform the supervisor or auditor of the respective contract, to review the requirement made and determine the procedure to follow, under the policies, internal rules and good practices of TGI and GEB.

In the case of subcontracting, Suppliers and Contractors must request authorization from TGI and/or GEB to share or provide information to the respective subcontractor.

In the same way, TGI and GEB's Contractors and Suppliers are obliged to have the mechanisms, software in general, with the elements of prevention and protection of TGI's and GEB's information, according to GEB's Corporate Information Security and Cybersecurity Policy and/or TGI's Information Security and Privacy Model (MSPI). To this end, they must secure the information repositories, as well as have an information security system with mechanisms to prevent information leakage, unauthorized copying, downloading, and, in general, all relevant and appropriate measures to ensure the confidentiality and confidentiality of the information.

In case of not having their own policies, standards, or guidelines for information security, or if these are insufficient in the framework of the relationship with TGI and GEB, Suppliers and Contractors must adhere to the Corporate Information Security and Cybersecurity Policy of GEB and the Information Security and Privacy Model (MSPI), which is published on TGI's website and is available on the GEB's website and can be accessed in the link:

<https://www.tgi.com.co/nuestro-negocio/riesgos-y-ciberseguridad>

## 9 Sustainability

TGI and GEB seek that all their operations are framed in a sustainable environment, simultaneously looking for the generation of value for Shareholders and Stakeholders and the improvement of the environment in the territories where TGI and GEB are present.

Based on its Sustainability Strategy, TGI and GEB established the action principles that should guide the decisions and behavior of its Suppliers and Contractors:

- Protection of life and integrity. Respect for human rights.
- Transparency in the relationship with all its counterparties, including TGI/GEB's collaborators, representatives, and/or administrators.
- Ethical values and compliance.
- Acting as a group with a long-term vision.
- Building shared prosperity. Sustainability planning.
- Operational excellence and environmental performance. Prompt social and environmental performance.
- Rights and obligations.

Given the above, it is of vital importance to highlight that Suppliers and Contractors must ensure the respect and promotion of human rights, the protection and care of the environment, and the implementation of practices that promote fair and equitable labor relations.

# 9.1 Human rights

Suppliers and Contractors must comply with applicable laws and regulations, as well as with international standards regarding the respect and promotion of human rights, with special emphasis on, but not limited to, the following commitments:

Promote an inclusive work environment in which respect for differences and integrity prevails.

Guarantee the right to privacy and the good name of its employees.

Guarantee decent working conditions and reject forced labor practices, as well as the exploitation of child labor.

Recognize and respect the individual and collective rights of communities and any other stakeholders.

Promote the equality of treatment and opportunities, regardless of characteristics such as race, sex, gender identity, age, sexual orientation, culture, religion, socioeconomic status, political affinity, appearance, language and accent, disability, health, education, place of origin, work experience, job role and function, lifestyle, thinking, personality, among others.

To recognize the individual and social importance of the right of association and collective negotiation and to fully comply with the legal provisions aimed at their protection.

Protect the safety and health of all employees.

Reject any form of discrimination, violence, or harassment, and establish measures to prevent, address, punish and eradicate discrimination, violence, and harassment in the workplace.

Promote the protection of the environment and biodiversity, favoring healthy environments in their areas of influence.

Prohibit and punish retaliation for reporting harassment, threats, intimidation, and verbal, sexual, physical, or psychological abuse.

Strive to initiate efforts to implement a human rights policy.

As an integral part of the contract with TGI and/or GEB, Suppliers and Contractors must adhere to TGI and/or GEB's Human Rights Policy and must commit to respecting it.

## 9.2 Labor standards

### Suppliers and Contractors must:

Comply with applicable laws and regulations, both domestic and foreign, on labor, social security, and occupational health and safety.

Guarantee a safe working environment.

Adopt proactive measures to prevent health and safety risks in the workplace.

Promote the well-being of employees.

Encourage diversity, equity, and inclusion in the company.

Promote direct contracting, reducing subcontracting as much as possible, except for activities that are necessary by nature, complexity, and strategy.

Prohibit and punish any discriminatory practice.

Promote local employment.

Validate the suitability and capacity of its employees to carry out the contracted work activities.

Guarantee freedom of assembly and association of its employees, as well as the right to collective negotiation.

Ensure fair and equitable remuneration, promoting equal pay for work of equal value.

Ensure a working environment and conditions that respect the applicable legal provisions in terms of minimum wage, working hours, and vacations, among others, guaranteeing a balance between the work and personal life of its employees.

## 9.3 Environmental protection and care

### Suppliers and Contractors must:

Comply with all applicable laws and regulations, both domestic and foreign, regarding environmental protection and care.

Adopt initiatives to promote greater environmental responsibility.

Implement an environmental management system that promotes the reasonable and efficient use of natural resources in the development of their respective businesses.

Have systems to measure and monitor the environmental performance, especially in projects related to TGI and GEB.

Strive to implement actions for the reduction of greenhouse gas emissions, energy efficiency, and carbon footprint offsetting.

Adopt measures for the prevention of negative impacts on the environment, compensation of unavoidable impacts, and responsible waste management.

To promote the use of environmentally friendly materials as well as the implementation of practices and technologies.

To direct its efforts to raise awareness of the importance of caring for the environment and natural resources in the development of business activities.

Train its employees on the importance of respecting and caring for the environment at least once a year, when the duration of the contract is longer than 12 months.

Seek to incorporate a sustainable supply policy applicable to its suppliers and contractors.



# 10 Ethics Channel

Suppliers and Contractors must report through TGI's Ethics Channel any violation of this Code of Ethics and Conduct for Suppliers and Contractors, as well as any illegal or unethical act, misconduct, conflicts of interest, ethical dilemmas, bad practices, and/or non-compliance with TGI's and GEB's internal policies and standards. Suppliers and Contractors must inform their respective employees and subcontractors about the existence of the Ethics Channel, as well as the obligation to report any potential irregularities.

It is necessary that Suppliers and Contractors provide as much information and evidence as possible to facilitate the verification process. Transmitting or spreading unfounded rumors, filing reports, or providing deliberately false or misleading information will not be subject to follow-up or review by TGI and the GEB. Furthermore, it will be considered a violation of the guidelines stipulated in this Code of Ethics and Conduct for Suppliers and Contractors and, therefore, a violation of the respective contract signed with TGI and GEB.

The Ethics Channel is confidential, secure, and reliable. It is managed by an independent third party expert. Reports may be made anonymously. Otherwise, TGI and the GEB guarantee the protection of the identity and confidentiality of the information contained in the report or query to the greatest extent possible. In addition, any type of retaliation resulting from a report or inquiry through the Ethics Channel is prohibited.

When a report or inquiry is made through the Ethics Channel, the case is assigned a case number. The Supplier or Contractor making a report or inquiry must establish a password for follow-up or, if necessary, an extension of the information or inquiry. The Compliance Department reports the results obtained from the preliminary verifications or investigations carried out, or the response to the respective consultation, through the same means.



# 11

## Sanctions for non-compliance

The non-compliance with the provisions contained in this Code of Ethics and Conduct for Suppliers and Contractors gives rise to the implementation of corrective plans by TGI, which could go from the termination of a contract with TGI and/or GEB for a determined period, up to the termination due to breach of the respective contract or agreement.

The foregoing, without prejudice to the legal sanctions, of a civil, administrative, and/or criminal nature, that may be applicable according to the respective infraction.

# Definitions

**Shareholders:** Individuals or legal entities that have made a contribution in money or other appreciable assets in money to TGI and GEB in exchange for shares.

**Administrators:** Refers to the legal representative, the liquidator, the factor, the members of boards or boards of directors, and those who according to the bylaws exercise or hold these functions within TGI and GEB.

**Beneficial Owner:** Refers to the natural person(s) who ultimately owns or controls, directly or indirectly, the natural and/or legal person on whose behalf a transaction is conducted. It also includes the natural person(s) exercising effective and/or final control, directly or indirectly, over a legal person or other unincorporated structure and/or those established in the Colombian Tax Statute and/or the rules that modify or complement it.

**Ethics Channel:** Mechanism that allows (i) reporting any violation of this Code of Ethics and Conduct for Suppliers and Contractors, as well as illegal or unethical acts, misconduct, malpractice, and/or non-compliance with GEB's internal policies and standards, and (ii) making inquiries and requesting clarifications on ethical dilemmas.

**Contractors:** Natural or legal persons with whom GEB enters into a contract or service order for the provision of services to GEB.

**Employee:** Any natural person linked to GEB through an employment or apprenticeship contract, who provides services under subordination and in exchange for remuneration.

**Corruption:** The act of giving, offering, promising, soliciting or receiving (or any attempt to carry out such actions) money or anything of value, directly or through third parties, to guide someone's conduct to: (i) obtain or retain business, a benefit or commercial advantage; (ii) refraining from performing an act related to their duties or the duties of another person; and/or (iii) the abuse of their real or presumed influence. Among the acts of corruption are the following offenses foreseen in the Colombian Criminal Code or the rules that modify or replace it, without being the only ones: bribery by giving or offering; tax offenses and other offenses against public administration; improper use of privileged information; influence peddling by private parties; private corruption; unfair administration; agreements restricting competition; concealment; illicit enrichment and illicit enrichment of private parties.

**Fraud:** Any intentional act committed to obtain an illicit gain.

**Financing of Terrorism:** Refers to the set of activities aimed at channeling licit or illicit resources, directly or indirectly, to provide, collect, deliver, receive, administer, contribute, guard or store funds, goods, or resources, or perform any other activity that promotes, organizes, supports, maintains, finances or economically sustains organized crime groups, illegal armed groups or their members, national or foreign terrorist groups, national or foreign terrorists, or terrorist activities.

**Financing the Proliferation of Weapons of Mass Destruction:** Any act that provides funds or uses financial services, in whole or in part, for the manufacture, acquisition, possession, development, export, transfer of material, fractionation, transportation, transfer, deposit, or use of nuclear, chemical or biological weapons, their means of delivery and other related materials.

**GEB:** Refers to Grupo Energía Bogotá S.A. E.S.P., its subsidiaries, and subordinates.

**Stakeholders:** Refers to natural or legal persons interested in and/or affected by GEB's business activities. Includes but is not limited to: (i) Counterparties; (ii) communities; (iii) markets.

**Money Laundering:** Refers to the set of activities aimed at concealing the illicit origin or giving the appearance of legality to resources obtained from the execution of illicit or illegal activities.

**Facilitation Payments:** Payments to Public Officials to expedite the performance of non-discretionary duties, which are intended to influence the actions of the Public Officials, but not their outcome (e.g., payments made to obtain a permit or license).

**PEP:** Politically exposed persons, that is, individuals who perform public functions in any nomenclature and job classification system of the national and/or territorial public administration that, by their position, issue rules, regulations, or institutional policies; administer justice or have sanctioning powers, have the function of general management and/or directly manage or administer public goods, money or securities. This definition also includes senior executives of state entities, high-ranking officials in political parties, the judicial and legislative branches, heads of state, and others who have held this position for two (2) more years after leaving, resigning, or being dismissed from the position and/or those established in the regulations governing the matter.

**Suppliers:** Natural or legal persons with whom TGI/GEB may have a legal, commercial, and/or business relationship for the provision of goods, services, and/or products to TGI/GEB.

**Transnational Bribery:** Conduct constituting giving, offering, or promising to a foreign Public Official, directly or indirectly: (i) sums of money; (ii) objects of pecuniary value; and/or (ii) any benefit or advantage, in exchange for that foreign Public Official performing, omitting, or delaying any action related to their functions and in connection with an international business or transaction.

**TGI:** Transportadora de Gas Internacional S.A. ESP

# SUPPLIER OR CONTRACTOR ACCEPTANCE

[Name of the Supplier or Contractor], identified with the [citizenship card or Tax ID, depending on whether it is a natural or legal person], freely and spontaneously declare that:

1. I have received from TGI/GEB the Code of Ethics and Conduct for Suppliers and Contractors.
2. I am aware of the applicable laws and regulations in force, and I am committed to complying with them.
3. I will report to TGI/GEB, through the Ethics Channel, any violation or suspected violation of the Code of Ethics and Conduct of Suppliers and Contractors, TGI's and GEB's internal policies and standards of good practices, the law and/or ethics, as well as any potential conflict of interest in which the company I represent, its employees, as well as any conflict of interest of which I have any knowledge.
4. I will fully comply with the guidelines and parameters established in the Code of Ethics and Conduct for Suppliers and Contractors, as well as in other TGI and GEB internal good practice standards.
5. I will disseminate this Code of Ethics and Conduct for Suppliers and Contractors to my employees and subcontractors and ensure they comply with it.

**Name of Supplier or Contractor:**

**Supplier or Contractor identification number:**

**Name of the legal representative [in case of legal entity]:**

**Identification number of the legal representative [in case of legal entity]:**

**Date:**

---

Signature







**TGI**  
Grupo Energía Bogotá

*Energía para*  
**prosperar**