

## MATRIX OF HUMAN RIGHTS IMPACT ASSESSMENT AND MITIGATION MEASURES

| Impacted Human Rights or at risk of impact                | Possible impacts   | Business activity or Action plan  | Potentially affected actors  | Interested actors  | Business risks (compliance, operational, financial, reputational risks)  | Responsible department   | Management measures and impact mitigation  |
|---|--|---|--|--|--|--|--|
| Labor   |  |   |  |  |  |  |  |
| <b>RIGHT TO FAVORABLE WORKING CONDITIONS</b>              | Accidents at work and occupational diseases  | Business operation  | Employees and contractors  | National authorities (Ministry of employment and labor); trade unions and Human Rights NGOs. | (Reputational risk) There is a widespread notion that the company does not have clear work and social security procedures<br>(Compliance risk) it could be subject to lawsuits by the affected party<br>(Financial risk) Compensation payment  | Talent management; HSE sub-directorate                               | Recruitment policies, safety policies, Human Rights policies, risk control, occupational health and safety programs, labor coexistence committee, ethical guidelines, work site health and safety committees |
| <b>CHILD LABOR<br/>Child and Youth protection</b>         | Child labor in the value chain   | Commercial relationship with suppliers and contractors; outsourced operations       | Suppliers and contractors, exploited child community, community of the sphere of influence | National authorities, Family Court Commissioner; ICBF and Human Rights NGOs.                 | (Reputational risk) There is a widespread notion that the company affects children's rights and breaks the international treaties<br>(Operational risk) Value chain disruption<br>(Compliance risk) it could be subject to lawsuits<br>(Financial risk) The affectation of the company's good name increases the downside risk in the stock market | Supply Management- Compliance Department<br>Legal Process Management | Voluntary principles, Human Rights policies, current Human Rights protocols, labor coexistence committee, ethical guidelines   |
| <b>RIGHT TO UNIONIZE</b>                                  | Obstruction to the exercise of the right to unionize   | Recruitment of workforce, contracting goods and services, Organizational culture    | Unionized or non-unionized workers and contractors   | CUT, Ministry of employment and labor; other trade unions; public force                      | (Operational risk) Halted operations due to de facto actions and/or employees strikes<br>(Compliance risk) it could be subject to class action lawsuits  | Talent management; Compliance Department                             | Code of conduct, Human Rights policies; agreements with the public force; adherence to voluntary principles; labor coexistence committee   |
| <b>RIGHT TO NON-DISCRIMINATION</b>                        | Acts of discrimination in the recruitment process, in labor relations between employees of the company or between them and a third party for reasons of race, color, sex, religion, political opinion, nationality or social origin, or for any other circumstance.<br>Gender pay gap and inequality of opportunities for women's professional development | Recruitment of workforce and contracting services; Promotion and career advancement | Employees, suppliers and contractors   | Ministry of employment and labor; women's NGOs   | (Reputational risk) the company's brand is associated with acts of discrimination and there is a widespread notion that the company does not have inclusive workplace practices.   | Talent management; Compliance Department                             | Code of conduct, Human Rights policies, labor coexistence committee, ethical guidelines, Equity and Inclusion Policies, Diversity and Inclusion Committee  |
| <b>SOCIAL SECURITY</b>                                    | Non-compliance by the company for not considering in the contract clauses the provision of pensions, disability insurance, widow's and orphan's pensions, medical care and unemployment insurance.<br>In the value chain, local suppliers do not comply with employees   | Recruitment of workforce and contracting services                                   | Unionized or non-unionized workers and contractors   | Ministry of employment and labor   | (Compliance risk) it could be subject to individual or class action lawsuits   | Talent Management<br>Supply Management<br>Compliance Department      | Employment contracts; affiliation to pension funds and health care providers contracts.  |
| <b>RIGHT TO DECENT WORK AND FREE CHOICE OF EMPLOYMENT</b> | Inappropriate health care for employees who experience emergencies at the workplace, compressor stations or operational infrastructure   | Emergency Care Plan; Seguros Bolívar Insurance Policy                               | Employees and contractors  | Ministry of employment and labor; Ministry of Health and Social Protection; ARL              | (Compliance risk) it could be subject to lawsuits for non-contractual liability  | Talent management<br>HSE   | Code of Conduct, Internal Labor Regulations; Collective Bargaining Convention; External and Internal Audits  |
| <b>RIGHT TO WORK</b>                                      | Overstated expectations on employment generation, low employment of people from the region   | Recruitment of workforce, contracting goods and services                            | Communities of the sphere of influence   | Local Government, Human Rights NGOs  | (Reputational risk) It may generate damages in the communities and local governments' relationships.   | Social sub-directorate; communications; talent management            | HSEQ and social Manual for contractors, Human Rights policies, information and communication strategies, labor coexistence committee, ethical guidelines   |

## Security

|   |  |   |  |  |   |   |   |
|---|--|---|--|--|---|---|---|
| <b>RIGHT TO LIFE AND PHYSICAL INTEGRITY</b> | Abuse of force by members of private security companies or public force; A quarrel with the community. | Agreements with the public force; Contracting private security services   | The police, the army, communities of the sphere of influence             | Local Government, Human Rights NGOs, Ministry of defence, Ministry of the Interior   | (Reputational risk) To generate the belief that the company does not respect human rights with serious accusations, such as the use of violence against opposition groups                           | Social sub-directorate; communications; physical security | Human Rights Policies, voluntary principles, agreements with public force, contract with a private security provider, external audits |
|   | Selective violence against social leaders and Human Rights defenders                                   | Human Rights and security situation monitoring in the sphere of influence   | Communities of the sphere of influence, social and environmental leaders | Public force, private security provider, UNP-National Protection Unit, environmental and Human Rights NGOs, Local and National Government, Ministry of defense | (Reputational risk) It may affect the trust and the communities relationships under the assumption that the company may be involved in these events by omission or causation                        | Social subdepartment; communications; physical security   | Human Rights Policies, voluntary principles, agreements with public force, contract with a private security provider, external audits |
|   | Impacts on the security context (Armed and Organized Groups)   | According to the context of armed conflict in the region, public force and private security companies deploy security measures in the sphere of influence | Employees, executives, communities of the sphere of influence            | Local Government, Human Rights NGOs, Ministry of the Interior, Ministry of defence, Public Force   | (Operational and reputational risk) It may generate risks of kidnapping or extortion to the company's employees, and damage to infrastructure.<br>(Compliance risk) it could be subject to lawsuits | Social subdepartment; communications; physical security   | Human Rights Policies, voluntary principles, agreements with public force   |

## Environment

|   |   |   |   |   |  |                                |  |
|---|---|---|---|---|--|--------------------------------|--|
| <b>RIGHT TO A CLEAN AND HEALTHY ENVIRONMENT</b> | Pollution or excessive use of water generating poor quality or scarcity.<br><br>Noise Pollution<br><br>Visual Pollution             | Existence of deep wells, water collection, industrial waste disposal.<br><br>Noise generation from Compressor Stations operation<br><br>Visual affectation due to the use of flare stacks | Communities of the sphere of direct and indirect influence, employees and contractors, environment. | Regional autonomous corporations. Environmental NGOs, universities, ANLA, Ministry of the Environment | (Reputational risk) negative perception due to water pollution<br>(Compliance and operational risk) administrative sanctions or individual or class action lawsuits. License suspension<br>(Financial risk) compensation and fine payments             | Environmental sub-directorate, | Environmental Management Plan, environmental reports to competent authorities                              |
|   | Alteration of air quality   | To vent   | Communities of the sphere of direct and indirect influence, employees and contractors, environment. | Regional autonomous corporations. Environmental NGOs, universities, ANLA, Ministry of the Environment | (Reputational risk) negative perception due to air pollution<br>(Compliance risk) by guardianship actions and non-contractual liability<br>(Financial risk) compensation and fine payments   | Environmental subdepartment,   | Environmental Management Plan, environmental reports to competent authorities                              |
|   | Biodiversity loss, ecosystems deterioration and destruction because of the features of the operation's infrastructure and projects. | Operational maintenance work;<br>New expansion projects   | Communities of the sphere of direct and indirect influence, employees and contractors, environment. | Regional autonomous corporations. Environmental NGOs, universities, ANLA, Ministry of the Environment | (Reputational risk) negative perception due to the flora and fauna damage<br>(Compliance risk) by guardianship actions or administrative sanctions due to noncompliance with environmental permits.<br>(Financial risk) compensation and fine payments | Environmental sub-directorate, | Environmental permits, Environmental Management Plan, a contract with suppliers of transportation services |

## Economic and Social Rights

|  |   |  |  |  |  |   |  |
|--|---|--|--|--|--|---|--|
| <b>RIGHT TO AN ADEQUATE STANDARD OF LIVING</b> | Creation of dependence of the local economy on the company's business activity; increase in the cost of living. | Recruitment of workforce, contracting goods and services; tax payment for gas transportation, etc. | Inhabitants of the sphere of direct and indirect influence; local governments; suppliers and contractors | Other regional economic actors (coffee growers, rice growers, transporters, chamber of commerce) | (Reputational risk) Belief that all local economic problems are caused by the company's business activity<br>(Operational risk) a rise in the price for supplies | Supply Management-<br>Compliance Department<br>Legal Process Management | Sustainability Policy; Social Investment Programs; "Networks" Programs; Sustainable Development Programs; Implementation of the HSEQ and Social Manual including the obligation of local recruitment of workforce and suppliers of local goods and services; Training for Contractors. |
|--|---|--|--|--|--|---|--|

|  |   |   |  |   |   |   |  |
|--|---|---|--|---|---|---|--|
| <b>RIGHT TO AN ADEQUATE STANDARD OF LIVING</b>             | A negative impact on the local economy due to the shutdown of gas transportation operations; increase of unemployment levels                        | The shutdown of gas transportation operations   | Communities of the sphere of influence;  | Local and national authorities; compensation fund   | (Reputational risk) A belief that hydrocarbon activity is an enclave economy that does not generate long-term development processes.<br>(Operational risk) fiscal and financial close<br>(Financial risk) ceasing profitability   | Social sub-directorate<br>Supply Management                       | social management plan, HSEQ and social manual for contractors                               |
| <b>Civil and Political Rights</b>                          |   |   |  |   |   |   |  |
| <b>RIGHT TO VOTE</b>                                       | Undue influence and electioneering by the company's employees and contractors.  | Public and community relations  | Community of the sphere of influence; social movements and political parties; employees and contractors          | National Registry for Civil Status; National Electoral Council ; Ministry of the Interior (Democracy, Participation and Action Directorate); <i>Personeria</i> ; Ombudsman's Office; Human Rights NGOs; civilian oversight            | (Reputational risk) a perception that the company promotes its political agenda and influences electoral processes in a non-transparent manner.<br>(Compliance risk) investigations and sanctions due to election crimes<br>(Financial risk) Fine payments  | Talent management;<br>Compliance Department                       | Code of Conduct, Relationship Management Manuals, Human Rights Policy, Ethical Guidelines    |
| <b>RIGHT TO PARTICIPATE IN PUBLIC AFFAIRS</b>              | To restrict the freedom of expression of the company's employees and contractors, as well as their participation in social and political movements. | Recruitment of workforce and contracting services from local suppliers.                               | Community of the sphere of influence; employees; contractors and suppliers; social movements; political parties. | Constitutional Court of Colombia; Ministry of the Interior (Democracy, Participation and Action Directorate); <i>Personeria</i> ; Ombudsman's Office; Regional offices of the attorney general; Human Rights NGOs; civilian oversight | (Reputational risk) A perception that the company restricts the possibility of its contractors, employees and suppliers to express themselves freely.<br>(Compliance risk) investigations and sanctions due to violations of freedom of expression  | Talent management;<br>Compliance Department                       | Code of Conduct, Relationship Management Strategies, Human Rights Policy, Ethical Guidelines |
| <b>RIGHT TO PEACEFUL ASSEMBLY</b>                          | VIOLATIONS OF THE RIGHT TO PEACEFUL ASSEMBLY  | Agreement with public force; security arrangements.   | Communities of the sphere of influence; suppliers and contractors  | Local Government; Public Force; Attorney General's office ( <i>personerías</i> and Ombudsman's Office)  | (Operational risk) De facto proceedings<br>(Compliance risk) <i>Tutela</i> actions  | Talent management;<br>Compliance Department                       | Human Right Policy; Code of Conduct; Ethical Guidelines; Agreement with public force         |
| <b>Minority Rights</b>                                     |   |   |  |   |   |   |  |
| <b>RIGHT TO AUTONOMY AND SELF-DETERMINATION OF PEOPLES</b> | The company's negative influence by exerting pressure or interfering in a given community's cultural, political, and economic issues.               | Community relationship management- Ensuring opportunities for dialogue; Prior consultation processes. | Indigenous and black communities councils  | Ministry of the Interior (DACN, SIIC, Directorate of Prior Consultation); <i>Personeria</i> ; Ombudsman's Office; Human Rights NGOs; ONI and Court of Cundinamarca  | (Compliance risk) A petition before the IACHR and compensation payments<br>(Reputational risk) The deterioration of trust in the community relationship management and the co-optation of leaders for political or lucrative purposes<br>(Operational risk) It hinders the relationship management with interest groups | Contractual Management Sub-Directorate:<br>Social sub-directorate | Code of Conduct; Human Right Policy; Ethics and compliance policy                            |

|   |  |   |  |   |   |   |   |
|---|--|---|--|---|---|---|---|
| <b>RIGHT TO FREE, PRIOR AND INFORMED CONSULTATION</b> | Not consulting the special protection communities  | Prior consultation  | Indigenous and black communities councils  | Ministry of the Interior (DACN, SIIC, Directorate of Prior Consultation); <i>Personería</i> ; Ombudsman's Office; Attorney General's office; Human Rights NGOs; ONI and Court of Cundinamarca | (Operational risk) De facto actions, (Compliance risk) <i>Tutela</i> action, petition before the IACHR and other competent international and national entities                            | Contractual Management Sub-Directorate:<br>Social sub-directorate | Human Rights Policy; Ethics and compliance policy; Environmental permit   |
| <b>LAND RIGHTS</b>                                    | Restriction on the enjoyment of land rights due to belonging of resources and lands that people have naturally owned, occupied, or otherwise used or acquired. | New projects; Resettlement; Land Acquisition; Operation and maintenance | Indigenous and black communities councils; | Ministry of the Interior (DACN, SIIC, Directorate of Prior Consultation); <i>Personería</i> ; Ombudsman's Office; Attorney General's office; Human Rights NGOs; ONI and Court of Cundinamarca | (Operational risk) De facto actions. An operational shutdown due to court actions (Compliance risk) <i>Tutela</i> action, petition before the IACHR and other competent national entities | Contractual Management Sub-Directorate:<br>Social sub-directorate | Human Rights Policy, Environmental Management Plan, ethno-development program, environmental monitoring reports . |

## Transparency

|   |   |  |  |  |  |  |   |
|---|---|--|--|--|--|--|---|
| <b>FIGHT AGAINST CORRUPTION, BRIBERY AND OTHER TYPES OF EXTORTION</b> | Acts of corruption by employees, contractors, board members: bribes, unrecorded political contributions, charitable contributions and sponsorships, travel and gifts to public officials.   | Public and community relations<br>Commercial agreements; contracting goods and services; agreements with public force. | Communities of the sphere of influence; suppliers and contractors; local government. | Control entities; civilian oversight; NGOs   | (Reputational risk) There is a widespread notion that the company performs improper actions in favor of its interests. (Compliance risk) investigation and sentence to executives or employees allegedly involved. (Financial risk) fine payments. | Compliance Department;<br>Corporate Affairs Directorate;<br>Presidency | Anti-corruption policy, public commitment, company value statement, ethics and compliance policy, code of conduct, money laundering and terrorist financing prevention program. Report to the Ministry of Finance's UIAF              |
| <b>DISCLOSURE OF INFORMATION AND TAX MATTERS</b>                      | The concealment or partial disclosure to all interest groups about its policies and internal control mechanisms, as well as their ethics and compliance policy programs or measures. Also, about the efforts to fight corruption, bribery, and other types of extortion. Besides, it must promote employee compliance ensuring proper dissemination of such policies, programs, or measures, and it must develop training programs and disciplinary procedures. | Audits, self-assessments and trainings   | Investors, general public, Corporate Governance                                      | Public prosecutor office, Attorney General's office, Comptroller General office  | (Reputational risk)It creates a negative perception about the company's willingness to provide information. It produces mistrust and affects the relationship management with the interest groups.   | Compliance Department;<br>Corporate Affairs Directorate;<br>Presidency | Anti-corruption policy, public commitment, company value statement, ethics and compliance policy, code of conduct, money laundering and terrorist financing prevention  |
| <b>DISCLOSURE OF INFORMATION AND TAX MATTERS</b>                      | The concealment or partial disclosure to all interest groups about: tax and royalty payments; follow-up reports of environmental permit; budget and allocation of social investment; responding to complaints and claims.   | Accountability; sustainability reports; management reports; communication strategies; tax settlement.                  | Investors, interest groups;  | Prosecutor office, Attorney General office, Comptroller General office and civilian oversight; CREG, UPME, Ministry of Finance; DNP. | (Reputational risk) There is a widespread notion that the company does not comply with its tax obligations.  | Compliance Department;<br>Corporate Affairs Directorate;<br>Presidency | Anti-corruption policy, public commitment, company value statement, ethics and compliance policy, code of conduct, money laundering and terrorist financing prevention program and training statistics. External and internal audits. |

























































































































































































































































































