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PROTOCOL FOR THE PREVENTION OF WORKPLACE HARASSMENT AND HARASSMENT

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1. SECTION I

1.1. PURPOSE

Prevent, detect, and address alleged cases of discrimination, violence, harassment at workplace in any of its forms and/or sexual harassment through the adoption of Disclosure Mechanisms and Whistleblowing Procedures.

1.2. GENERALITIES

With the adoption of this protocol, Transportadora de Gas Internacional TGI S.A. ESP, establishes the mechanisms aimed at the prevention of behaviors covered by Law 1010 of 2006 and Law 1257 of 2008, in order to prevent and address discrimination and / or workplace violence, in general, Labor Harassment in any of its modalities and Sexual Harassment, as well as promoting complaint or denunciation channels to prevent hidden practices from being kept hidden, ignored or silenced by those who suffer it.

With this document TGI S.A. ESP, reiterates its commitment to non-discrimination and equal opportunities within the framework of the Gender Equality Management System.

1.3. STATEMENT

Transportadora de Gas Internacional S.A. ESP rejects any form of discrimination, violence or harassment at workplace or sexual harassment and promotes the right to equality in employment and occupation, by the Company's Diversity and Inclusion Policy, or the document that modifies or replaces it.

2. SECTION II

2.1. HOW IS WORKPLACE HARASSMENT (WH) DEFINED?

Article 2 of Law 1010 of 2006, defines Labor Harassment as "any persistent and demonstrable conduct, exercised on an employee, worker by an employer, a boss or immediate or immediate superior, a coworker or a subordinate, aimed at instilling fear, intimidation, terror and anguish, causing harm at work, generating demotivation and anguish, to cause labor damage, to generate demotivation at work, or to induce resignation from work".

2.2. WHAT ARE THE MODALITIES IN WHICH WORKPLACE HARASSMENT (WH) IS PRESENTED?

The second paragraph of Article 2 of Law 1010 of 2006 describes the general types of Workplace Harassment, among others:

2.2.1. Labor Mistreatment:

It is defined as:

- Acts of violence against the physical or moral integrity, physical or sexual freedom and property
 of the employee or worker.
- Insulting or insulting verbal expressions that harm moral integrity or intimacy and good name.
- Any behavior that tends to undermine the self-esteem and dignity of anyone involved in a work relationship.

2.2.2. Labor persecution:

Conduct that has the characteristic of repeated or clear arbitrariness that allows inferring the purpose of inducing the employee's resignation or producing demotivation at work, by means of:

- Disqualification.
- Excessive workload.
- Permanent schedule changes.

2.2.3. Labor Discrimination:

Any differential treatment for reasons of race, gender, age, family or national origin, religious creed, sexual orientation, political preference, or social situation that lack all reasonableness from the labor point of view.

2.2.4. Employment Discrimination Against LGBTIQ+ Communities

Discrimination in the workplace against the LGBTIQ+ community is related to harassment in the workplace as a consequence of negative social representations related to diverse sexual orientations and gender identities, and is defined in this document as any persistent and demonstrable conduct exercised against an employee, worker by an employer, a boss or immediate or immediate superior, a co-worker or a subordinate, aimed at -either through physical, virtual or even verbal means- to instill differential treatment, fear, intimidation, terror and anguish, to cause labor prejudice, generate demotivation at workplace, or induce resignation from work, due to sexual orientation, sex reassignment or diverse gender identity.

2.2.5. Labor Disturbance:

Any action tending to:

- Obstructing the performance of the work or making it more burdensome or delaying it to the
 detriment of the worker or employee Deprivation, concealment or rendering useless of supplies,
 documents, or instruments for the work.
- Destruction or loss of information.
- Concealment of correspondence or electronic messages.

2.2.6. Labor Inequity:

- Assignment of functions to the detriment of the worker or employee.
- Violation of the principle of equality.

2.2.7. Labor unprotection:

Conduct that jeopardizes the integrity or safety of the worker, through orders or assignment of functions without complying with the minimum requirements for the protection and safety of the worker.

2.2.8. Virtual Workplace Harassment or Workplace Cyberbullying:

Virtual Workplace Harassment or Workplace Cyberbullying is defined as threats, harassment, aggression, humiliation, or other types of annoyance within the framework of communications that are related to work, carried out by means of information technologies and communication technologies. Accordingly, the ILO defines cyberbullying in the world of work as "any aggressive behavior against an individual victim or an individualized group of victims through ICTs in the context of the workplace". It adds that "the foreseeable result of inflicting these acts is physical or psychological harm to a victim or a group of victims, often resulting in the degradation of working conditions of the victim(s) or the work environment in general. In addition, cyberbullying requires that aggressive behavior occur on a regular basis over a reasonable period or that the incidence of such aggressive behavior has a lasting detrimental effect.

2.3. WHAT IS THE LAW PROTECTING?

The second paragraph of article 1° of Law 1010 of 2006, states as protected legal assets:

- Work in dignified and fair conditions.
- Freedom.
- Privacy.
- Honor.
- Mental health of workers.
- Harmony among those who share the same work environment and a good atmosphere in the Company.
- Human dignity.

2.4. WHO CAN BE ACTIVE SUBJECTS OR PERPETRATORS OF WORKPLACE HARASSMENT?

They can be perpetrators of workplace harassment:

Any natural person who performs as a collaborator of the Company.

The situations of workplace harassment referred to in Law 1010 of 2006 are only those that occur in a relationship of dependence or subordination of a labor nature.

2.5. WHAT ARE THE BEHAVIORS THAT CONSTITUTE WORKPLACE HARASSMENT AND WHAT ARE NOT?

2.5.1. Conduct that constitutes Workplace Harassment:

The behaviors in which Labor Harassment occurs may be:

- 1) downward, when the victim is in a lower position.
- 2) horizontal, when it occurs between male and female employees of the same rank and,
- 3) ascending, when the victim of workplace harassment occupies a higher position.

Any differential treatment based on race, gender, age, family or national origin, religious creed, sexual orientation, political preference, or social status that is unreasonable from an employment standpoint.

By Article 7 of Law 1010 of 2006, it will be presumed that there is workplace Harassment if there is evidence of the repeated and public occurrence of any of the following conducts:

- Acts of physical aggression.
- The insulting or outrageous expressions about the person.
- Hostile and humiliating comments of professional disqualification.
- Unjustified threats of dismissal.
- Humiliating disqualification in public.
- Multiple reckless disciplinary complaints by any of the active subjects of the harassment.
- The humiliating disqualification in the presence of co-workers of work proposals or opinions.
- Teasing about physical appearance or manner of dress, made in public.
- Public allusion to facts about the intimacy of the person.
- Assignment of duties outside the work obligation and the abrupt change of the place of work or of
 the contracted work without any objective foundation concerning the technical necessity of the
 company.
- The requirement to work excessive hours in relation to the working day.
- Treatment that is notoriously discriminatory since race, sexual orientation, political preference, family, or religious origin, with respect to other employees.
- The refusal to supply materials and information indispensable for the performance of the work.
- The clearly unjustified refusal to grant leaves of absence, sick leave, ordinary leave, and vacations, when the legal, regulatory, or conventional conditions for requesting such leave are met.
- The sending of anonymous telephone calls and virtual messages with injurious, offensive, or intimidating content or the subjection to a situation of social isolation.

And it is added to the above:

Using negative or offensive language to describe people from LGBTIQ+ communities.

2.6. WHAT ARE THE PREVENTIVE AND CORRECTIVE MEASURES FOR WORKPLACE AND/OR SEXUAL HARASSMENT?

The Company has mechanisms in place to prevent harassment at work, established by law and incorporated in our internal work regulations, which establish an internal, confidential, and conciliatory procedure to take place between the parties involved once the complaint or denunciation of labor harassment becomes known.

Within these preventive mechanisms within the Company, the following are established:

- 1. Information to employees about Law 1010 of 2006, which may include preventive disclosure campaigns, talks and training on the content of the law, particularly in relation to the behaviors that constitute harassment at workplace, those that do not, aggravating circumstances, mitigating behaviors and punitive treatment.
- 2. Spaces for dialogue, participation circles or groups of a similar nature for the periodic evaluation of working life, with the purpose of promoting operational coherence and functional harmony that facilitate and encourage effective treatment within the Company.
- 3. Design and implementation of activities with the participation of employee to:
 - (a) Establish through joint construction, values and habits that promote convivial work life.
 - b) To make any constructive recommendations that may be necessary in connection with business situations that could affect the fulfillment of such values and habits, and
 - c) Examine specific conduct that may constitute harassment at work or other harassment in the Company, which may affect the dignity of persons, indicating the corresponding recommendations.
- 4. Other activities established by the Company at any time to develop the purpose of preventing workplace harassment.

In any case, it should be noted that the Company's Labor Connivance Committee may be called upon in accordance with the provisions of the Case Management procedure (E-mail: comite.convivencia@tgi.com.co), in order to bring to the attention of the Committee the facts that the employees consider, regarding possible conduct that may constitute harassment, so that the case is managed in accordance with the provisions of document P-GTH-026 Management in Cases of Alleged Workplace Harassment and Sexual Harassment, or the document that modifies or replaces it.

When conciliation is not achieved between the parties, and the workplace harassment is duly accredited by the competent entity, it will proceed in accordance with the regulations contemplated in Law 1010 of January 23, 2006.

3. SECTION III

3.1. HOW IS SEXUAL HARASSMENT DEFINED?

Law 1257 of 2008 defines Sexual Harassment when it occurs in the workplace, for such purpose it is defined in the same law, Article 29, by which Article 210 A is added to Law 599 of 2008.

"Article 210 A.

Sexual harassment. Whoever, for his own benefit or that of a third party and taking advantage of his manifest superiority or relations of authority or power, age, sex, labor, social, family or economic position, uses sexual harassment, persecutes, harasses or besieges physically or verbally, for non-consensual sexual purposes, another person, shall incur in prison from one (1) to three (3) years of imprisonment."

Law 1257 of 2008 introduced in the Colombian legal system mechanisms to eradicate the cycles of sexist violence that reproduce Sexual Harassment (SA) against women employees and constitutes a manifestation of the will of the Colombian State, however, these prohibitions apply to all persons regardless of their sex.

3.2. WHICH ARE THE MODALITIES OF SEXUAL HARASSMENT?

As stated by the ILO, sexual harassment can occur in diverse ways:

- 1. As blackmail: when the victim is conditioned with the attainment of a labor benefit salary increase, promotion or even the permanence
- 2. As a hostile work environment in which the conduct results in situations of intimidation or humiliation of the victim.

3.3. BEHAVIORS THAT ARE CONSIDERED TO BE SEXUAL HARASSMENT

They can be of a physical nature:

- Physical: physical violence, touching, unnecessary approaches.
- Verbal: comments and questions about appearance, lifestyle, sexual orientation, offensive phone calls.
- Nonverbal: gestures with sexual connotations, presentation of pornographic objects, among others.

3.4. EXAMPLES OF FORMS OF SEXUAL HARASSMENT

- Unnecessary and unwanted physical contact.
- Annoying remarks and other forms of verbal harassment.
- Lewd looks and sexually related gestures.
- Requests for sexual favors.
- Insults, remarks, jokes, and innuendoes of a sexual nature.

- Sexual comments, jokes, gestures or looks.
- Sexual touching, pulling, or pinching.
- Restraining the victim against someone in a sexual manner.
- Spreading sexual rumors about the victim.
- Tugging at clothing in a sexual manner.
- Showing, giving, or leaving sexual images, pictures, illustrations, messages, or sexual notes.
- Sexual writings, messages (graffiti, graffiti) about the victim, on bathroom walls, locker rooms, etc.
- Forcing someone to kiss.
- Calling out the victim's sexual orientation in a negative way.
- Spying while changing or locked in a restroom.
- The use or exhibition of pornographic material.

Law 1257 of 2008 defines violence against women and the types of violence, in terms of any action or omission that causes death, harm or suffering, physical, sexual, psychological, economic, sexual, psychological, economic or patrimonial violence because of her condition as a woman, as well as threats of such acts, coercion or arbitrary deprivation of freedom, whether it occurs in the public or private sphere.

These conducts typified in the Penal Code may be committed by any natural person.

3.5. WHO CAN BE VICTIMS OR AGENTS OF SEXUAL HARASSMENT?

All TGI employees or collaborators can be victims of the crimes proven in the Penal Code related to sexual harassment, regardless of their race, sexual orientation, gender, all people can go to the communication channels to report acts of sexual harassment.

3.6. WHAT DAMAGES ARE RECOGNIZED AS A CONSEQUENCE OF WORKPLACE HARASSMENT AND SEXUAL HARASSMENT?

- To a dignified life.
- To physical, sexual, and psychological integrity.
- To privacy, not to be subjected to torture or cruel and degrading treatment.
- To real and effective equality.
- To not be subjected to any form of discrimination.
- To freedom and autonomy, to free development of personality.
- To health, sexual and reproductive health.
- To personal safety.
- To the adequate and confidential handling of any situation that may arise and that requires a comprehensive management by human dignity.
- To the creation of a warm and trusting environment that generates empathy, acceptance, and respect.

To voluntarily decide whether you want to be confronted with the aggressor in any of the areas of care, administrative, judicial, or other internal procedures of the company.

In addition, by the provisions of the regulations, the rights of the victims of Labor or Sexual Harassment at Workplace are as follows:

- To receive dignified and humane treatment.
- To be always treated with confidentiality.
- To be listened to, to be addressed, to be informed (in a clear, complete, truthful, and prompt manner and especially regarding their sexual and reproductive rights).
- To the exercise of labor activity, privacy, and good name.
- To the protection of her privacy, to the guarantee of her safety and that of her family members and witnesses on her behalf.
- To stabilize their situation and full reparation of the damage suffered.
- To receive free, immediate, and specialized orientation, legal advice, and legal technical aid, from the moment that the event constituting violence is brought to the attention of the competent authority, protecting human dignity but guaranteeing inclusion.
- To give informed consent for legal-medical tests in cases of sexual violence.
- To choose the sex of the doctor for the practice of the same within the possibilities offered by the service.
- To decide, always and voluntarily, if she/he can be confronted with the aggressor in any of the spaces and procedures.
- To receive comprehensive care (specialized and comprehensive medical, psychological, psychiatric, and forensic aid under the terms and conditions established in the legal system for them and their children).
- To have access to protection and care mechanisms for themselves and their children.

3.7. WHAT ARE THE MECHANISMS FOR THE PROTECTION OF THE COMPLAINANT VICTIM?

In all cases that constitute crimes, the victims have protection measures against any publicity that implies an undue attack on their private life or dignity (Art. 133, Code of Criminal Procedure).

In the labor field, one of these protection mechanisms is the Labor Connivance Committee.

To this extent, TGI S.A. ESP, reiterates its commitment to develop information, awareness, prevention, and attention actions related to practices and facts of Labor Harassment and Sexual Harassment. Additionally, to supply training and awareness mechanisms to avoid barriers and that TGI S.A. S.A. ESP's collaborators can develop their activities in adequate conditions in inclusive contexts of recognition of human dignity.

Finally, the Company has provided its employees with a form to report Labor and Sexual Harassment, which is uploaded in ISOLUCION, as well as the e-mail address of the connivance committee comite.convivencia@tgi.com.co.

3.8. ROUTES TO DENOUNCE SEXUAL HARASSMENT - CRIMINAL ROUTE

Any natural person can use this route, such as when he/she considers him/herself a victim of the SA. The victim can go to the following authorities for criminal complaints:

- URI: Immediate Reaction Units.
- S.A.U.: User Attention Rooms
- CAIVAS: Centers for Attention to Victims of Sexual Abuse.
- National Police Assignment Office.

Finally, it is important to point out that the Company may start the corresponding disciplinary processes in case of sexual harassment or any other breach of labor obligations.

4. SECTION IV. LABOR CONNIVANCE COMMITTEE

4.1. WHAT IS THE LABOR CONNIVANCE COMMITTEE?

It is a preventive mechanism of Labor and/or Sexual Harassment that contributes to protect employees against psychosocial risks that affect health in the workplace, regulated by Decree 437 of 2012, in order for it to assume the resolution of Labor Harassment conflicts, as provided by Law 1010 of 2006, which will be integrated in the manner provided for in Article 1° of Resolution 1356 and 652 of 2012 of the Ministry of Labor.

The Labor Connivance Committee is limited to deal with complaints of Labor Harassment under the parameters set up by Law 1010 of 2006. Likewise, it is aware of conducts of Sexual Harassment due to the possibility of being framed within the definition of labor mistreatment since it is a possible affectation of the employee's sexual freedom.

The Labor Connivance Committee shall provide support to all persons belonging to Transportadora de Gas Internacional TGI S.A ESP, without distinguishing on the basis of their gender identity, generational, cultural, cultural, ethnic-racial, territorial, socioeconomic, ideological, sexual orientation, political opinion, health status, and health status of the employee, and their different physical and psychological capabilities, which are required to accurately identify harassment at work and provide advice, if applicable, on the handling of Sexual Harassment complaints. In the event that the committee identifies that the conduct reported may involve a disciplinary breach, it shall involve a disciplinary breach, it will proceed to refer it to the Labor Relations Sub-Directorate (SRL), or the unit that takes its place, so that an evaluation can be made as to whether the Labor Relations Sub-Directorate (SRL), or the unit that takes its place, will evaluate whether it warrants the opening of a disciplinary investigation and apply possible corrective disciplinary actions.

The Labor Connivance Committee shall jointly advance with the Vice-Presidency of Human Resources and Administrative Management, or whoever takes its place, the actions aimed at the following actions aimed at preventing and addressing the possible occurrence of Labor and/or Sexual Harassment.

4.2. WHAT DOCUMENTS ARE PART OF THIS PROTOCOL?

This document includes the Internal Work Regulations, the Regulations of the Company's Labor Connivance Committee, the Procedure for the Management of Cases of Alleged Labor Harassment, the

Form for Reporting Complaints of Labor and/or Sexual Harassment, and the matrix for monitoring cases of Labor and/or Sexual Harassment.

Management of Alleged Workplace Harassment Cases, the Complaint Form for Filing Complaints of Workplace and/or Sexual Harassment, and the follow-up matrix for cases of Workplace Harassment, which is confidential and may only be consulted by committee members.

5. SECTION V

5.1. CHANNELS FOR COMPLAINTS OR DENUNCIATION OF LABOR AND/OR SEXUAL HARASSMENT IN THE COMPANY

The channels defined by TGI to receive complaints of possible Workplace Harassment and/or Sexual Harassment are: Call to the ethics channel (01800-012-54-70) or fill out the form for filing complaints of Labor Harassment that is loaded in ISOLUCIÓN, or the document that modifies or replaces it, and send it through the e-mail box of the Labor Connivance Committee (comite.convivencia@tgi.com.co or the one that replaces it), for attention by the Labor Connivance Committee of the Company.

Version	Date	Reason for Update					
1	25/May/2021	The Corporate Document DC-GTH-001 Protocol for the prevention					
		Workplace Harassment and Sexual Harassment is created in the					
		Management System, the purpose of which is to advance in the					
		prevention, detection and care of Workplace Harassment and Sexual					
		Harassment through the adoption of mechanisms of prevention ar					
		the dissemination of the Complaint Mechanisms and Procedures					
2	30/Dec/2022	The Holding's document DC-GTH-001 Prevention of Labor and Sexua					
		Harassment Protocol, and its modifications:					
		The document includes the following statements:					
		Any person can be victims of sexual and/or labor harassment					
		regardless of sexual orientation and gender.					
		The definition of Discrimination Labor of LGBTIQ+ Communities					
		The Modalities of Workplace Harassment. which adds the definition					
		Virtual Workplace Harassment or Workplace Cyberbullying					
		The channels to complaint or denunciate, the connivance committee					
		no longer receives allegations or complaints of sexual harassment. 5.1.					
		The channels defined by TGI to receive complaints for workplace					
		harassment are: Call the ethics channel (01800-012-54-70) or fill out					
		the form for filing complaints that is uploaded in ISOLUCIÓN, or t					
		document that changes or replaces it and send it through the en					
		address of the Labor Connivance Committee					
		(comite.convivencia@tgi.com.co or the					
		to act as such), for attention by the Company's Labor Connivance					
		Committee, and 5.2. The only channel defined by TGI to receive					
		complaints or reports of possible sexual harassment is fill out the					
		filing of Sexual Harassment complaints and send it to the email:					
		relaciones.laborales@tgi.com.co who will give you					
		investigation process by the provisions of the Company's Internal Labor					
		Regulations (R-GTH-002), especially its CHAPTER XVII and following, of					

		the document that changes or replaces them.
3	29/May/2023	The Corporate Document DC-GTH-001 Protocol for the
		Prevention of Labor and Sexual Harassment, and whose modifications
		are:
		The OBJECT is changed, like this:
		Prevent, detect, and address alleged cases of discrimination, violence,
		Workplace Harassment in any of its modalities and/or Sexual
		Harassment through the adoption of Disclosure Mechanisms and
		Procedures for Complaint.
		DECLARATION is included
		Transportadora de Gas Internacional S.A. ESP rejects any form of
		discrimination, violence or labor or sexual harassment, and promotes
		the right to equality in employment and occupation, by the Policy
		Corporate Diversity and Inclusion, the document that changes or
		replaces it.
		In numeral 4.1. WHAT IS THE LABOR CONNIVANCE COMMITTEE?
		The connivance committee is defined as a preventive and care
		mechanism for the possible occurrence of Labor and/or sexual
		harassment. Likewise, it is specified that the committee is aware of
		behaviors of Sexual Harassment by the possibility of being framed
		within the definition of labor abuse, as it is an affectation of the
		employee's sexual freedom.
		In Section 5.1. CHANNELS FOR COMPLAINTS OR COMPLAINTS OF
		LABOR AND/OR SEXUAL HARASSMENT IN THE COMPANY
		A single complaint or reporting channel for workplace and/or sexual
		harassment in the Company is determined, this being: hotline
		ethics channel or email comite.convivencia@tgi.com.co

Author	Revised			Approved			
Name: Valentina del Pilar Zapata	Name:	Eduardo	Salcedo	Name:	Lynda	Julie	Murillo
Moreno	Zambrano			Gutierrez			
Post: Professional	Post: Sub-director			Post: Vice President			
Date: 29/May/2023	Date: 29/May/2023			Date: 29/May/2023			