

# Artificial Intelligence, Data and Analytics Policy



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Grupo Energía Bogotá

## SCOPE OF THE DECISION

Adopt the Corporate Policy for the Use of Artificial Intelligence, Data and Analytics of Grupo Energía Bogotá (“GEB”) and its subsidiaries.

## BACKGROUND

According to the review conducted during Executive Committee No. 31 held on December 15, 2025, the approval of the Innovation and Digital Transformation Policy for Grupo Energía Bogotá and its controlled companies was recommended, considering it suitable for the organization.

International discussions regarding the use of artificial intelligence have highlighted the importance of protecting people and strengthening trust in these technologies by promoting principles of ethics, transparency, security, and responsible oversight, as emphasized by UNESCO, the OECD, and European regulations on AI. These guidelines constitute a widely recognized reference framework for organizations seeking to adopt artificial intelligence responsibly and aligned with a clear purpose.

In this context, Grupo Energía Bogotá is advancing its digital transformation process by incorporating advanced analytics, automation, and artificial intelligence to improve productivity, modernize operations, and strengthen the management of corporate processes. This technological evolution requires the definition of clear guidelines that ensure consistency, quality, traceability, and alignment with institutional technology, analytics, and data governance strategies, enabling these capabilities to deliver real and sustainable value.

Likewise, GEB maintains a strong commitment to ethics, transparency, corporate responsibility, and regulatory compliance. Therefore, the adoption of artificial intelligence must reflect these principles, properly manage risks, and preserve stakeholder trust.

In this regard, the Corporate Artificial Intelligence, Data and Analytics Policy constitutes a key instrument for guiding the development, adoption, and oversight of these technologies, ensuring their contribution to organizational purpose and the sustainable future of the Group.

## PURPOSE

To establish the framework for the responsible, secure, and ethical use of artificial intelligence (AI), particularly in the development, adoption, and application of AI systems and/or tools, as well as in the processing, analysis, and safeguarding of data within the activities, processes, services, products, and decisions of GEB and its subsidiaries.

Likewise, this policy defines the principles that must guide the use of artificial intelligence



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within GEB and its subsidiaries, ensuring proportionality, transparency, human oversight, and respect for fundamental rights.

These principles ensure that AI adoption creates value, drives digital transformation, and is developed in harmony with institutional guidelines and values.

### SCOPE

This policy applies to Grupo Energía Bogotá S.A. ESP and its controlled companies, in accordance with the regulations applicable within each jurisdiction where they operate.

Controlled companies must implement this policy according to the nature, size, complexity, and structure of their operations.

### STATEMENT OF COMMITMENTS

1. Promote the ethical, responsible, and secure use of Artificial Intelligence tools implemented by GEB and/or its subsidiaries, ensuring an organizational culture that prioritizes the security, integrity, and reliability of the information and data used within such tools.
2. Comply with national and international regulations applicable to GEB and its subsidiaries regarding the design, development, assurance, and use of artificial intelligence solutions, within the framework of ethics, personal data protection, copyright, and intellectual property rights.
3. Comply with technical standards to develop secure solutions that are resilient against cyberattacks, lawful, legitimate, and ethically responsible.
4. Design and implement AI solutions that are secure, understandable, explainable, auditable, and traceable by documenting their purpose, operation, risks, bias identification and control mechanisms, and by providing clear and accessible explanations to users.
5. Use, whenever appropriate, the data and/or results generated through AI analysis and processing as inputs for decision-making within GEB and its subsidiaries' internal procedures, always ensuring human supervision and intervention under the principle that AI tools complement rather than replace ethical judgment.
6. Generate efficiencies for GEB and its subsidiaries' internal processes while ensuring data quality and the quality of outputs generated.
7. Establish an AI governance model that defines, proportionally to risk, the teams, roles, and responsibilities involved throughout the AI lifecycle, as well as the traceability, audit, and oversight mechanisms necessary to ensure transparency in analyses and data usage.
8. Protect personal data throughout all stages of the AI solution lifecycle—from design, controlled pilots, deployment, operation, and retirement—by applying technical, organizational, and legal measures aligned with principles of legality, purpose limitation, confidentiality, security, restricted access or circulation, minimization, proportionality, and



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accountability, in accordance with applicable regulations.

9. Manage AI-related risks, including cybersecurity risks, throughout the entire lifecycle of AI solutions through identification, evaluation, treatment, and continuous monitoring, supported by indicators and incident response plans (containment, reversal, communication, and lessons learned) aligned with the corporate risk appetite.
10. Promote the development and use of AI solutions that generate sustainable operational efficiency, contribute to risk mitigation, and create value and benefits for both the Companies and the communities where they operate.
11. Ensure that selected technologies are interoperable, secure, technologically assessed, and aligned with GEB and its subsidiaries' digital ecosystem and internal control system.
12. Consolidate and maintain a corporate platform for data, analytics, and AI that enables sharing, reuse, and scaling of assets, services, and models across GEB and its subsidiaries.
13. Align the implementation of AI, data, and analytics solutions with existing GEB policies and guidelines in general, and particularly with those concerning information security and cybersecurity, data governance, and GEB's analytics strategy, ensuring compliance with commitments, principles, and technical, ethical, and operational consistency.
14. Train and raise awareness among employees regarding the ethical, responsible, and secure use of AI technologies by developing the necessary capabilities for informed and responsible use through differentiated programs according to roles and business-prioritized needs.

### IMPLEMENTATION PROCESS

This policy shall be implemented through the Innovation and Digital Transformation process or its equivalent.

### POLICY RESPONSIBILITIES

All GEB employees and subsidiaries' personnel involved in developing artificial intelligence, data, and analytics projects are responsible for complying with this policy.



Senior Management is responsible for approving this policy and exercising continuous leadership and commitment regarding the guidelines established on ethics, responsibility, and reliability in the use of AI within GEB and its subsidiaries' internal processes. Likewise, Senior Management shall monitor compliance with this policy through the periodic reports generated and submitted by the Innovation and Digital Transformation Directorate to the Executive Committee.

The Corporate Innovation and Digital Transformation Directorate, or its equivalent, is responsible for leading the management, implementation, monitoring, control, updating, and continuous improvement of this policy, as well as ensuring alignment with the corporate strategy. Likewise, it shall provide ongoing guidance regarding the commitments incorporated within this policy.

Communications areas are responsible for communicating and disseminating this policy through available channels to ensure awareness throughout the organization.

Employees shall immediately and in good faith report, through the Ethics Channel, any conduct, event, or situation that may represent a breach of this policy, the Code of Ethics and Conduct, or the Company's internal regulations.

The Corporate Compliance Directorate is responsible for managing reports involving potential violations of the provisions established in this Policy.

## GLOSSARY

1. **Analytics:** use of data for decision-making through the discovery, interpretation, and communication of meaningful patterns. *(Source: DAMA-DMBOK 2.0 Guide; McKinsey Explanation of AI)*
2. **Data:** Facts represented as text, numbers, graphics, images, sound, or video that constitute the raw material from which information can be represented or derived.
3. **DAMA International (DMBOK) - Data Management Body of Knowledge:** A guide containing data management best practices (2009).
4. **Artificial Intelligence:** The ability of a machine to perform cognitive functions that are normally associated with human minds, such as perceiving, reasoning, learning, interacting with the environment, solving problems, and even demonstrating creativity. *(Source: McKinsey - What is AI?)*
5. **Proportionality:** use of AI systems should not exceed what is necessary to achieve a legitimate objective. Risk assessments should be used to prevent harm arising from illegitimate uses. *(Source: UNESCO Recommendation on the Ethics of Artificial Intelligence)*