



**CODE OF ETHICS AND CONDUCT  
FOR SUPPLIERS AND CONTRACTORS**

**GRUPO ENERGÍA BOGOTÁ S.A. E.S.P.**

**CODE OF ETHICS AND CONDUCT  
FOR SUPPLIERS AND CONTRACTORS**

**June 2022**



## CODE OF ETHICS AND CONDUCT FOR SUPPLIERS AND CONTRACTORS

### Message from the President

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

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

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

Our Suppliers and Contractors are fundamental in the achievement of our higher purpose, the respect of our corporate values, as well as in 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 have the duty to respect and comply with, in a responsible manner, in all their interactions with GEB and its Stakeholders. This is the only way to build solid, sustainable, and transparent commercial relationships, based on trust and respect, and on the highest ethical and regulatory standards, which 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 make this document come alive in each of your actions and interactions, when making decisions, in your daily work and in your life in general, with coherence and integrity.



## CODE OF ETHICS AND CONDUCT FOR SUPPLIERS AND CONTRACTORS

### Scope

This Code of Ethics and Conduct for Suppliers and Contractors is a normative and consultation document, of mandatory compliance for all GEB Suppliers and Contractors, whatever they may be, including, if applicable, their parent companies, subsidiaries and/or affiliates, as well as GEB employees whose duties include the execution of contracts to be signed with contractors and who ensure compliance with them within GEB.

It is the responsibility of Suppliers and Contractors to adopt, honor and disseminate this Code of Ethics and Conduct for Suppliers and Contractors with their employees and subcontractors, effectively verifying its dissemination 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 GEB's other compliance rules, policies and procedures and good practices, including, but not limited to the Code of Ethics, the Policy on Internal Control and Prevention of Fraud and Corruption, the SIPLA Manual, the Human Rights Policy, the Personal Data Processing Policy, the Information Security and Cybersecurity Policy, confidentiality agreements, and others.

Knowledge, dissemination 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 GEB and the Suppliers or Contractors, emphasizing that in the case of suppliers and contractors that have their own compliance policies, these shall be proposed for evaluation by GEB through the Compliance Department.

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

GEB reserves 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.



## CODE OF ETHICS AND CONDUCT FOR SUPPLIERS AND CONTRACTORS

### General Guidelines

#### 1. Ethics and Corporate Values

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

- Life Comes First: This is our most important value, as it teaches us to **take care** of ourselves and those persons around us, ensuring that everyone goes home safe and sound at the end of the day.
- Integrity: It is the value that allows us to act in a coherent, upright, honest, fair, and objective manner; it is the component that leads us to act in a **transparent** manner before GEB and all our Stakeholders, in order to achieve our objectives.
- Teamwork: Invites us to work in collaboration, constantly communicating among ourselves and generating **trust**. It reminds us that we all have a specific mission, that when it is joined with the missions of others, produces extraordinary results.
- Focus on results: Reminds us of the importance of working focused to achieve the expected results, and thus make our company a **sustainable** organization over time, that fulfills its role in society.
- Empathy: This value teaches the importance of **respecting** everyone's point of view, without discrimination and without bias in regard to beliefs, race, ideas and other factors, so that we can elevate our humanity every day.

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

- Transparency: Refers to managing in an objective, clear and verifiable manner, as from the submission of bids in GEB's contracting processes.
- Respect: Refers to how we interact, recognizing collective interests, individual diversity, sustainability of natural resources and institutions.
- Equity: Refers to how we act with justice and impartiality, seeking to cause positive and inclusive social impact.



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- **Good Faith:** refers to acting in good faith in pre-contractual, contractual, and post-contractual relations with GEB.
- **Lawfulness:** Refers to carrying out business activities subject to the applicable laws, rules, and regulations, as well as the conditions agreed upon in the contracting processes and in the contracts or agreements entered into with GEB.
- **Responsibilities:** 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 goods and/or services and to be accountable for them.

### 2. Duties and Obligations of Suppliers and Contractors

The following is a list of the duties and obligations of all suppliers and contractors, which must be fully observed and complied with in the framework of any commercial and/or contractual relationship with GEB:

- Formulate bids or offers with fair values.
- Refrain from bidding at artificially low prices or in violation of good and sound competitive practices.
- Refrain from providing false, inaccurate, or misleading information.
- Ensure compliance with copyright, intellectual property, information security, personal data protection and other internal and external regulations that must be complied with.
- Duty to act in good faith, loyalty, and collaboration, in the sense of providing information that should be known by GEB in connection with the execution of the contracts or related to any other kind of information that may be of interest to GEB and affect its reputation.
- Report through the channels established for this purpose (Ethics Channel), any situation that may be considered or constitute a conflict of interest, whether personal, family, or economic.
- Report through the ethics channel any situation that may involve a violation of GEB's ethical, legal, and regulatory framework, such as violations of the code of ethics and conduct, policies, illegal or unethical conduct, violation of internal procedures, among others.

### **3. Fraud, Corruption, and International Bribery Prevention**

GEB is committed to a zero-tolerance policy against Fraud, Corruption and International Bribery.

Therefore, GEB Suppliers and Contractors must have internal policies, standards or guidelines that allow them to identify, detect, evaluate, mitigate, monitor, investigate, prevent, manage, control and correct the risks of fraud, corruption, international bribery and, in general, any unethical and/or illegal conduct in the development of their economic activity, and specifically in its relations with GEB, in accordance with applicable national and international regulations, such as Law 2195, the Foreign Corrupt Practices Act (FCPA), the OECD Anti-Bribery Convention, United Nations Conventions, and others.

At the very least, Suppliers and Contractors must:

- Ensure ethics, transparency, legality and good faith in their actions and business, as well as in the development of their activities and operations.
- Ensure that the money or resources received from 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 Fraud, Corruption and International Bribery incidents.
- Mitigate legal, operational, reputational, and economic risks derived from events or activities associated with Fraud, Corruption and/or International Bribery.
- Immediately report to GEB any event of Fraud, Corruption and/or International Bribery through its Ethics Channel.
- Refrain from offering, granting, promising, accepting, insinuating, receiving, or requesting from GEB employees, or from national or foreign public officials, an undue advantage of any value, whether in money or in kind, directly or indirectly, for their own benefit or that of a third party.
- Refrain from delivering and/or promoting Facilitation Payments when dealing with counterparties.
- Guarantee and respect free business and economic competition by avoiding practices such as collusion, restrictive practices, or cartelization, among others,
- Manage their 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.



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- 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 corruption and/or bribery.

In the event that GEB does not have its own policies, standards or guidelines for the prevention and control of Fraud, Corruption and International Bribery, or if these are insufficient within the framework of the relationship with GEB, Suppliers and Contractors must adhere to GEB's internal compliance policies and standards related to the matter, emphasizing that in case of discrepancy between one standard and another, priority should be given to the observance and applicability of GEB standards.

In every case, facilitation payments and lobbying expenses are expressly prohibited.

### 4. Gifts and Gratuities

GEB Suppliers and Contractors are prohibited from offering, giving, promising, accepting, insinuating, receiving or soliciting gifts and gratuities from Group Employees, except in the case of 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, agendas, calendars, umbrellas).

Suppliers and Contractors may invite GEB Administrators and Employees to events and/or celebrations, who in turn must follow the internal procedure defined for these situations. In addition, the Suppliers or Contractors, as the case may be, may not cover travel, lodging and per diem expenses, if required; these shall be assumed by 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 GEB, for example, theater plays, tourism trips, places where men and women are used as an element of distraction or in a denigrating manner, among other things, (b) that have as their object any requirement, consideration or something that may represent a potential conflict of interest, (c) cash or equivalent, such as bonuses, (d) any consideration that may be perceivable or reproachable from the point of view of transparency and moral good business practices.

In any case, contractors and suppliers must fully observe and comply with GEB's gifts and gratuities policy.





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### 5. Conflicts of interest

GEB Suppliers and Contractors face a conflict of interest whenever their independent and impartial judgment is compromised and they have to choose between GEB's interest and their own, a third party's or a related party's interest when making decisions. Suppliers and Contractors must act in good faith, with transparency and correctness and in an impartial manner 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, GEB expects Suppliers and Contractors to immediately evaluate and report, through the Ethics Channel, any situation of real or potential conflicts of interest in which they are or may become involved, as well as those of which they become aware within the framework of their relationship with GEB.

Said conflicts are defined as follows:

- **Personal conflict of interest:** A conflict of interest arises when objectivity and independence is distorted by a relationship, or potential relationship, with persons who are or have been close to the individual, but with whom there is no blood, affinity, or civil relationship.

For example, former co-workers, classmates, childhood friends, best man or woman from a marriage, godfather, or godmother of children, among others.

- **Family Conflict of interest:** We may be facing a family conflict of interest when objectivity and independence is distorted by a relationship or potential relationship with relatives who are under the fourth degree of consanguinity, third degree of affinity, first civil degree or with our spouse or permanent partners, as follows:
  - Consanguinity
    - First degree: Between parents and children
    - Second degree: Between siblings, half-siblings, grandparents, and grandchildren
    - Third degree: Between uncle and nephew
    - Fourth degree: Between cousins





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- Affinity
  - First degree: Between in-laws and sons-in-law or daughters-in-law.
  - Second degree: Spouse's siblings - Brother-in-law, sister-in-law.
  - Third degree: Uncles, cousins of the spouse.
- Civil kinship:
  - Between adoptive parents and adoptive children.
- **Economic Conflict of interest:** An economic conflict of interest, whether potential or real, arises when we are faced with situations of relationships with individuals or legal entities, with whom we have some type of prior relationship of a proprietary nature.

For example: Linking GEB as a supplier to a company of which I am a registered agent, shareholder, board member or other, accepting to be an external advisor to a company that has links with GEB, or being an intervenor and/or supervisor of contracts in which there is some economic interest, among others.

### 6. Prevention of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction

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, Terrorist Financing and the Financing the Proliferation of Weapons of Mass Destruction, in accordance with the regulations applicable to the exercise of their economic activity.

At the very least, Suppliers and Contractors must:

- Ensure that the money or resources received from GEB within the framework of any contractual or business relationship will be used solely and exclusively for lawful activities.
- Design and implement procedures to get to know their respective counterparts and their final beneficiaries and/or real beneficiaries.
- Implement applicable actions to detect, prevent, control, and manage events and/or suspicious operations of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction.



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- Mitigate legal, operational and economic risks derived from events or activities associated with Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction.
- Report any event of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction to GEB through the Ethics Channel.
- Ensure proper understanding of counterparties, through fully defined due diligence procedures, 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 counterparties.
- Advise and justify to GEB the need to outsource any type of service or activity included in the contract signed with 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 restrictive lists, both domestic and international, or associated with money laundering, terrorist financing or related crimes.

If they do not have their own policies, standards or guidelines for the prevention and control of Money Laundering, Terrorist Financing and Financing the Proliferation of Weapons of Mass Destruction, or if these are insufficient within the framework of their relationship with GEB, Suppliers and Contractors must adhere to GEB's SIPLA Manual, which is published on GEB's website and can be consulted at the following link <https://www.grupoenergiabogota.com/conoce-geb/programa-de-etica-y-cumplimiento>

### 7. Personal Data Processing

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

The main objectives of GEB's Personal Data Processing Policy are to:

- Regulate the collection, storage, use, circulation, suppression, transfer, and transmission of personal data carried out by GEB.
- Ensure that the personal data owners can be aware of, include, update, rectify, delete and revoke the authorization regarding their personal information that is subject to processing by GEB.
- Establish the guidelines that ensure the protection of personal data that are processed by GEB as the responsible party.



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- Ensure that Suppliers and Contractors fully comply with the processing of personal data.
- Handle with the strictest confidentiality and reserve the personal data of which it has knowledge, only being able to disclose them in the cases strictly indicated by law.
- Report any security incident related to the exposure of personal data held in custody.

GEB's Personal Data Processing Policy is permanently published on GEB's website and can be consulted at the following link

<https://www.grupoenergiabogota.com/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, GEB expects Suppliers and Contractors to take all appropriate measures to safeguard and properly and confidentially handle the information they become aware of in the framework of the relationship with GEB.

By way of example, Suppliers and Contractors are prohibited from:

- Publishing, without prior and express authorization, in whole or in part, information of which they become aware in the context of their relations with GEB.
- Using information of which they become aware in the context of their relations with GEB for their own benefit or that of a third party, to the detriment of GEB.
- Using information of which they become aware in the context of their relations with GEB to engage in 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 GEB. Likewise, they must maintain confidentiality with respect to negotiation processes, contractual processes, business relations, bidding and transactions in the securities market, among others.



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In case they are required by any domestic or foreign authority in connection with any contract they have with GEB, Suppliers and Contractors must immediately inform the supervisor or auditor of the respective contract, in order to review the requirement made and determine the procedure to be followed, in accordance with GEB's policies, internal regulations and standards of good practice.

In case of outsourcing, Suppliers and Contractors must request GEB's authorization to share or provide information to the respective subcontractor.

Likewise, for all interactions with GEB networks, GEB contractors and suppliers are obliged to have in place mechanisms, software and, in general, all elements for the prevention and protection of GEB information, in accordance with the GEB's Corporate Information Security and Cybersecurity Policy. 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 privacy 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 GEB, Suppliers and Contractors must adhere to GEB's Corporate Policy on Information Security and Cybersecurity, which is published on GEB's website and can be consulted at the following link <https://www.grupoenergiabogota.com/gobierno-corporativo/politicas-corporativas>.

### 9. Sustainability

GEB seeks to ensure that all its operations are embedded in a framework of sustainability, while at the same time seeking to create value for Shareholders and Stakeholders and to improve the environment in the territories where it operates.

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

- Protection of life and integrity.
- Respect for human rights.
- Transparency in the relationship with all its counterparties, including GEB's employees, representatives and/or managers.
- Ethical values and compliance.
- Group action with a long-term vision.
- Building shared prosperity.
- Sustainability planning.
- Operational excellence and environmental performance.



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- Timely social and environmental action.
- Rights and obligations.

In view of the foregoing, it is vitally important that Suppliers and Contractors 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 respect for 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 decent working conditions and reject forced labor practices, as well as child labor exploitation.
- Promote equal 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, thought, personality, among others.
- Reject any form of discrimination, violence, or harassment, and establish measures to prevent, address, punish and eradicate discrimination, violence, and harassment in the workplace.
- Prohibit and punish retaliation for reporting harassment, threats, intimidation, and verbal, sexual, physical, or psychological abuse.
- Guarantee the right to privacy and the good name of all employees.
- Recognize and respect the individual and collective rights of communities and other stakeholders.
- To recognize the individual and social importance of the right of association and collective bargaining and to fully comply with the legal provisions aimed at their protection.
- Protect the health and safety of all employees.
- Promote the protection of the environment and biodiversity, favoring healthy environments in their areas of influence.
- Strive to initiate efforts towards the implementation of a human rights policy.

As an integral part of their contract with GEB, Suppliers and Contractors must subscribe to GEB's Human Rights Policy and undertake to abide by it.



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### 9.2 Labor Standards

Suppliers and Contractors shall:

- Comply with applicable laws and regulations, both domestic and foreign, in labor, social security and occupational health and safety matters.
- Guarantee a safe working environment.
- Take proactive action to prevent occupational health and safety risks at the workplace.
- Promote employee well-being.
- Encourage diversity, equity, and inclusion in the company.
- Promote direct contracting, reducing outsourcing as much as possible, except for activities that by nature, complexity and strategy are necessary.
- Prohibit and penalize any discriminatory practice.
- Promote local employment.
- Validate the suitability and capacity of its employees to carry out the contracted work activities.
- Ensure freedom of assembly and association of its employees, as well as the right to collective bargaining.
- Ensure fair and equitable compensation, promoting equal pay for work of equal value.
- Ensure a work environment and working conditions that respect applicable legal provisions in terms of minimum wage, working hours, vacations, etc., guaranteeing a balance between the work and personal life of its employees.

### 9.3 Protection and Care of the Environment

Suppliers and Contractors shall:

- Comply with all applicable laws and regulations, both domestic and foreign, related to protection and care of the environment.
- Undertake 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 in place to measure and monitor environmental performance, especially in projects related to GEB.
- Strive to implement actions to reduce greenhouse gas emissions, promote energy efficiency and offset the carbon footprint.
- Adopt measures to prevent negative impacts on the environment, compensate for unavoidable impacts, and manage waste responsibly.
- Promote the use of environmentally friendly materials and the implementation of environmentally friendly practices and technologies.



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- Target its efforts to raise awareness of the importance of caring for the environment and natural resources in the development of business activities.
- Train employees on the importance of respecting and caring for the environment at least once a year when the contract duration exceeds 12 months.
- Seek to incorporate a sustainable sourcing policy applicable to its suppliers and contractors.

### 10. Ethics Channel

Suppliers and Contractors must report through GEB 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, malpractice and/or non-compliance with GEB 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 important that Suppliers and Contractors provide as much information and evidence as possible to facilitate the verification process. Rumor transmission and dissemination activities without a basis and deliberately false or misleading information that is presented will not be subject to follow-up or review by 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, as a violation of the respective contract signed with GEB.

The Ethics Channel is confidential, safe, and reliable. An independent expert third party manages the Channel. Reports may be made anonymously; otherwise, GEB guarantees to protect the identity and confidentiality of the information contained in the report or inquiry to the greatest extent possible. In addition, any type of retaliation resulting from a report or inquiry through the Ethics Channel is prohibited.

The Ethics Channel is comprised of the following tools:

- Toll-free telephone numbers:
  - Colombia: 01800 518 9191
  - Peru: 705 22 33
  - Guatemala: 502 2378 4852
- E-mail: [canaleticogeb@ethicsglobal.com](mailto:canaleticogeb@ethicsglobal.com)
- Website, option, Ethics Channel





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When a report or inquiry is made through the Ethics Channel, it 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 report or inquiry. GEB will report the result from the preliminary verifications or investigations that are performed, or the response to the inquiry through the same channel.

### **11. Penalties for Non-compliance**

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 GEB, which may range from the limitation to contract with GEB for a determined period of time to termination of the respective contract or agreement.

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



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### Definitions

**Shareholders:** Individuals or companies that have made a contribution in cash or other assets that can be valued in cash to GEB in exchange for its shares.

**Managers:** Refers to the registered agent, the liquidator, the factor, the members of boards or councils of directors and those who, in accordance with the bylaws, exercise or hold these functions within GEB.

**Final beneficiary:** Refers to individuals who ultimately represent, directly or indirectly, the individual or company on whose behalf a transaction is conducted. Also includes the natural persons exercising effective and/or ultimate representation, directly or indirectly, over a legal person or other unincorporated structure and/or those established in the Colombian Tax Law and/or the rules that amend or supplement it.

**Ethics channel:** Mechanism used to (i) report any violation of this Code of Ethics and Conduct for Suppliers and Contractors, as well as illegal or unethical acts, misconduct, bad practices and/or non-compliance with GEB's internal policies and standards, and (ii) make inquiries and request clarifications on ethical dilemmas.

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

**Employee:** Any natural person linked to GEB by means of 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 a third party, for the purpose of guiding someone's conduct to: (i) obtain or retain business, a benefit or a commercial advantage; (ii) refrain from performing an act related to their duties or the duties of another person; and/or (iii) abuse their real or presumed influence. Acts of corruption include the following crimes stipulated in the Colombian Criminal Code or the regulations that modify or replace it, although they are not the only ones: bribery by giving or offering; tax offenses and other crimes against public administration; improper use of privileged information; trading in private influence; private corruption; dishonest administration; agreements restricting competition; concealment; illicit enrichment and illicit enrichment of private individuals.

**Fraud:** Any intentional act committed for unlawful gain.



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**Terrorist financing:** Refers to the set of activities aimed at channeling licit or illicit resources, directly or indirectly, to provide, collect, deliver, receive, administer, contribute, safeguard or store funds, goods or resources, or perform any other act that promotes, organizes, supports, maintains, finances or economically sustains organized crime groups, armed groups outside the law 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, transport, 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 affiliates, and subsidiaries.

**Stakeholders:** Refers to natural or legal persons interested in and/or affected by GEB's business activities. Including but 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 Servants to expedite the performance of duties of a non-discretionary nature, which are intended to influence the actions of Public Servants, 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 of any nomenclature and job classification system of the national and/or regional public administration that, by virtue of 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 government entities, high-ranking officials of 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:** Individual or legal entities with which GEB may have a legal, commercial and/or business relationship for the provision of goods, services and/or products to GEB.



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**International bribery:** Conduct consisting of giving, offering, or promising a foreign public servant, directly or indirectly: (i) sums of money; (ii) objects of pecuniary value; and/or (iii) any benefit or advantage, in exchange for that foreign Public Servant performing, omitting or delaying any act related to his or her functions and in connection with an international business or transaction.



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### ACCEPTANCE OF THE SUPPLIER OR CONTRACTOR

[Name of the Supplier or Contractor], bearing [citizenship card or TIN, depending on whether it is a natural or legal person], freely and spontaneously declares that:

1. I have received from 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 undertake to comply with them.
3. I will report to GEB, through the Ethics Channel, any violation or suspected violation of the Code of Ethics and Conduct for Suppliers and Contractors, GEB's internal policies and standards of good practice, the law and/or ethics, as well as any potential conflict of interest in which the company I represent, its employees or administrators are involved, 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 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 that they also comply with it.

Name of Supplier or Contractor:

Identification document of Supplier or Contractor:

Name of Registered Agent [in the case of a company]:

Identification document of Registered Agent [in the case of a company]:

Date:

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Signature