

Ethics Channel User Manual

Grupo Energía Bogotá S.A. E.S.P.



GrupoEnergíaBogotá



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1. Introduction

Based on a model of pedagogical and participatory compliance that allows managing risks based on a culture of legality and setting the parameters of defense plans

- preventive and reactive - and according to Grupo Energía Bogotá's (herein, GEB) Corporate Governance Code, Code of Ethics, Internal Control and Fraud and Corruption Prevention Policy and anti-corruption principles promoted in the United Nations Global Compact and law 1474 of 2011, 1712 of 2014 and 1778 and 2016, the Ethics Channel is the instrument by means of which GEB guarantees every Group shareholder, manager, employee, contractor and other stakeholders' right to report situations that could eventually be qualified as alleged fraud and/or corruption or unethical behaviors in GEB, in order to manage and operate corporate business transparently and sustainably. In addition, this Channel allows making inquiries to help resolve ethical dilemmas, under the guarantee that it is confidential, safe and reliable.

2. Principles of the Channel

GEB's Ethics Channel is based on best international practices and is inspired by the following principles:

Natural Dialog: This principle is based on learning, internalization and institutionalization instruments, in accordance with a pedagogical and participatory compliance model that seeks to limit invasive measures that disrupt the work environment as much as possible. The Channel is expected to be friendly with the organizational environment and support the business as a learning instrument for corporate citizens who respect the competencies of authorities.

Commitment: For GEB, eradicating and preventing all fraud, corruption or any behaviors that go against ethics, the law and regulations is a priority, reason why management promotes a culture of ethics, in accordance with the highest professional and corporate standards, in its way of doing business.

Protection of the informant: GEB guarantees all Group managers, employees and contractors that reports received through the Ethics Channel will be confidential, and the whistleblowers' identity will be protected to avoid any kind of reprisal.

Confidentiality: GEB is committed to all information related to Preliminary Verifications or investigations performed as a consequence of a report made through the Channel being known only by the people authorized to that end in the process.



3. Scope

Any GEB director, employee, shareholder or third party, or any citizen, has the right to report fraud, corruption or any unethical behavior, formulate consultations and make ethical dilemmas known to the Group through the Ethics Channel.

4. Objectives

- To detect alleged fraud and/or corruption or behaviors in GEB that go against the Group's ethics, regulations and standards through reports.
- To investigate, following Preliminary Verification, any conducts that have been found that allegedly represent acts of fraud or corruption, or that run against the Group's corporate ethical standards.
- To address inquiries on ethical dilemmas submitted through the Channel.
- To remedy or mitigate the risks detected by means of verifications or investigations performed based on reports made through the Ethics Channel.
- To implement preventive measures in accordance with the risks observed in the verifications or investigations performed based on reports through the Ethics Channel.

5. Behaviors to report

Since the Policy on Internal Control and Prevention of Fraud and Corruption is aimed at fighting all fraud and/or corruption via the Ethics Channel, all acts considered fraud and/or corruption or unethical behavior may be reported. Some examples may be:

- Work harassment / Sexual harassment
- Bribery, extortion, theft
- Conflict of interest
- Financial fraud
- Misuse of assets



6. Operational Elements of the Channel

Receipt of complaint or consultation: It will be processed through an independent, external and expert third party via the following mechanisms:

1. A toll-free telephone number with a number assigned to each country in which Grupo Energía Bogotá companies are located.

Colombia: 01800-518-9191

Peru: 705-22-33

Guatemala: 502-2378-4852

2. A link to the Ethics Channel on each Grupo Energia Bogota company's website.
3. E-mail: canaleticogeb@ethicsglobal.com
4. ethicsglobal cell phone app which you can download from your electronic store, appstore or playstore.

Content of the complaint or consultation: The report must include at least the following information:

- Detailed description of the facts
- Date or period in which the facts took place
- Place of the facts
- Type of report
- Optionally, the identification of the people who allegedly performed the reported behaviors
- The reporting party's personal information in cases in which the report has to do with labor issues; in all other cases, it may be anonymous

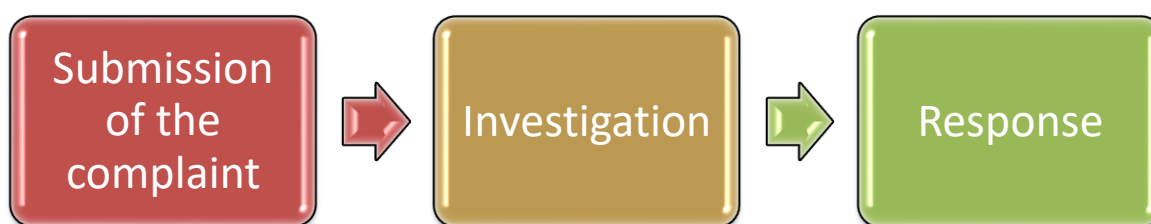
Information management: The report made through the Ethics Channel is centralized and managed by an independent third party, which then submits said report to GEB's appropriate bodies for them to make the decisions they consider pertinent in compliance with the Group's policies.

Feedback: The mentioned bodies will inform the result of the decision regarding the reported case or consultation to the reporting party through the Channel.

Communication, training and evaluation plan: The Group has a communications plan that promotes a culture of Zero Tolerance to fraud and corruption. This plan is implemented through training and dissemination campaigns, among other activities, under the responsibility of the Compliance Department and led by Talent Management.

The Compliance Department will periodically evaluate and update the Ethics Channel to make sure it has been properly implemented and is working effectively.

7. Operational flow of the Ethics Channel



8. Sanctions and corrective and/or disciplinary actions

The failure to comply with our ethical framework or GEB's Human Rights Policy give raise to disciplinary sanctions in accordance with our internal work regulations and the sanctions provided, without prejudice to legal, contractual, civil and/or criminal sanctions that may apply according to the respective infringement.