

CODE OF ETHICS AND CONDUCT



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I. Commitment of the Board of Directors

As members of the Board of Directors of Transportadora de Gas Internacional S.A. ESP. we are convinced that the basis to ensure TGI's sustainability, as well as to generate confidence in all our stakeholders, is to have a culture of legality, ethics, and transparency, represented by our corporate value of INTEGRITY.

Therefore TGI adopts the Code of Ethics and Conduct established by GEB as one of the essential elements of the organization. Through this Code, we seek to reflect the commitment of the Group and all its subsidiaries in the promotion and appropriation of conduct and behaviors that ensure the development of our operations and our relationships with all our stakeholders in a responsible, legal, ethical, and transparent manner, based on the values of Life First, Empathy, Focus on Results, Teamwork with Individual Responsibility and Integrity. This will enable us to manage and administer the risks of fraud, corruption, bribery, money laundering, financing of terrorism, financing of the proliferation of weapons of mass destruction, and conflicts of interest.

For this, we invite each recipient of this Code of Ethics and Conduct to get to know, internalize and replicate with great interest and commitment the guidelines included herein in their daily activities in all aspects of their lives, both personal and professional

From the Board of Directors, we ratify that TGI adopts an unwavering position of NO tolerance towards any deviation from the ethical and legal framework of TGI and the Group, as well as the permanent commitment to fight against corruption, fraud, bribery, or any illicit activity, contributing to the correct development and operation of the markets.

We count on everyone to continue making TGI an integrated and transparent company!

II. Invitation of the Chair and Presentation of the Code

The Board of Directors of Grupo Energía Bogotá, the parent company of the Corporate Group, approved this Code of Ethics and Conduct, which was adopted by TGI's Board of Directors and contains the guidelines to keep strengthening our ethical culture, and thus comply with our primary objective of "Improving Lives with Sustainable and Competitive Energy". We are a subsidiary of GEB, a business group in constant growth and consolidation, committed to the responsible and transparent exercise of our processes and building relationships with all our stakeholders based on trust, security, legality, ethics, and transparency.

To achieve the above, from TGI's Presidency and Senior Management we are committed to complying with each of the guidelines and standards included herein, which are listed as mandatory for all collaborators of the Business Group. Our challenge is to strengthen our value chain, generate growth and provide a high-quality service, achieving the challenge of expansion that we have set ourselves and consolidating our position as a leading business group in the energy sector in Colombia and Latin America.

Our priority is establishing transparent and efficient communication mechanisms based on our corporate values. For TGI and GEB, ethical behavior standards are a fundamental element for creating value and consolidating trustworthy relationships with our environment. Therefore, we expect that the provisions contained in this Code of Ethics and Conduct, as well as those contained in other rules, policies, and procedures for compliance and good practices of TGI and GEB, are known and complied with, strengthening, and consolidating our culture of control and ethics.

From TGI, we ratify our desire to continue building a company and a business group leader in the market, in which we develop our activities within the framework of legality and good practices, complying with this Code of Ethics and Conduct. To this end, I count on you to develop your activities and operations consistent with our culture, committed to integrity, ethics, and transparency.



III. Our Code of Ethics and Conduct

TGI's Code of Ethics and Conduct defines the standards of behavior that the organization expects from all its collaborators. This document should be considered the roadmap for developing all activities, operations, and processes of TGI and Grupo Energía Bogotá based on the ethical principles of transparency, respect, equality, legality, and responsibility.

Scope

This Code is addressed to the members of the Boards of Directors and to the collaborators of TGI and Grupo Energía Bogotá. Likewise, the beneficiaries and relatives of our collaborators, clients, allies, and all of TGI and Grupo Energía Bogotá's Counterparties.

Therefore, all those to whom the Code is addressed must know, internalize, apply, and disseminate the provisions contained therein and must ensure that their actions are always in line with the rules it develops, without prejudice to the observance of common sense and other criteria that correspond to correct and honest behavior.

For its part, TGI, as a subsidiary of GEB, adopts the rules of this Code and ensures their dissemination and application.

IV. Our corporate values and ethical principles

The development of all our operations, the relationship with our stakeholders, and the actions in the markets in which we do business are configured and carried out under our corporate values, the principles of behavior, and the guidelines for action established in this Code.

The following are our corporate values:



Life First

This value motivates us to take care of ourselves and the people around us, ensuring that everyone gets home unscathed at the end of the day.



Integrity

It teaches us to work ethically, honestly, responsibly, and transparently, remembering that we must always act correctly even if no one is watching.



Teamwork with individual responsibility

It invites us to work collaboratively, communicating constantly and building trust. It reminds us that we all have a specific mission, which, when united with the task of others, produces extraordinary results.



Focus on results

It reminds us of the importance of working focused to achieve the expected results, and thus make our company a sustainable organization in time, which delivers to the society.



Empathy

This value teaches us the importance of respecting the viewpoints of everyone, without discrimination or bias against beliefs, race, ideologies, and other factors, so that we can elevate our humanity every day.

In addition, in compliance with the duties inherent to their positions, all TGI and GEB's Administrators and Collaborators must act under the following ethical principles:

Transparency:

It refers to performing management in an objective, clear and verifiable manner.

Respect:

It refers to interacting in recognition of collective interests, individual diversity, sustainability of natural resources, and institutionality.

Equality:

It refers to acting with fairness and impartiality, seeking a positive and inclusive social impact.

Legality:

This refers to conducting business activities in good faith and in compliance with applicable laws, rules, and regulations.

Responsibility:

This refers to making the highest and best effort to achieve business objectives in compliance with applicable laws, rules, and regulations, as well as to ensure the quality of the work performed and to be accountable for it.

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Responsibilities of TGI's and GEB's Administrators and Collaborators

At TGI and GEB, we emphasize the importance that the members of the Boards of Directors, administrators, and collaborators, who are recognized as the ones in charge of proudly carrying the name of TGI and GEB, know and internalize the responsibilities that emanate from this Code of Ethics and Conduct. Part of these responsibilities are:

To know, adopt, and replicate the information contained in this Code and to promote within the Business Group a culture based on our corporate values and ethical principles.

To put into practice the guidelines contained in this code on a daily basis and in each of their actions.

To contribute to the construction of a transparent operation and to ensure the management and mitigation of risks of fraud, corruption, bribery, money laundering, financing of terrorism, financing of the proliferation of weapons of mass destruction, conflicts of interest, and generally, all compliance risks identified in the operations of TGI and GEB.

To certify, when required, the knowledge, commitment, and adoption of the guidelines included in this code.

To develop all operations, processes, and procedures of TGI of GEB and its subsidiaries in an integral, legal, ethical, and transparent

To report in the ethical channel, in good faith, any consultation, ethical dilemma, and/or

To actively participate in all communication and training spaces on Compliance initiatives, focused on ensuring a culture based on legality, integrity, ethics, and transparency.

To provide promptly and with the required quality the information requested within the framework of the internal verifications carried out by the control areas of TGI and GEB.

TGI's and GEB's Senior Management will lead by example the compliance with the principles and values established in this Code.

Senior Management shall constantly communicate to their work teams the need to comply with the guidelines included in this code, as well as to ensure that no undue pressures are generated that contradict TGI's and GEB's ethical framework and/or the corporate governance policies designed by GEB and adopted by TGI.

VI. Guidelines for compliance with applicable legislation and internal regulations

TGI and Grupo Energía Bogotá are committed to full compliance with the current and applicable legislation on the prevention and mitigation of compliance risks in the countries where it operates.

Particularly, TGI and GEB comply with the regulatory provisions on the prevention and management of fraud, corruption, transnational bribery, money laundering, financing of terrorism, financing of the proliferation of weapons of mass destruction, information management, protection of personal data, and, in general, all applicable compliance risks.

a. Prohibition of acts associated with fraud, corruption, and bribery

TGI and GEB are committed to a zero-tolerance policy against fraud, corruption, and bribery. Thus, it is forbidden to give, offer, grant, promise, insinuate, accept and/or request an undue advantage of any value, whether in money or kind, directly or indirectly, to any third party, including Suppliers, Contractors, Customers, and national or foreign public officials.

Collaborators must know, understand and fully comply with the internal regulations that establish the guidelines to identify, detect, evaluate, mitigate, monitor, investigate, prevent, manage, control, and correct the risks of fraud, corruption, and bribery within TGI and GEB and in the development of their business activities.

b. Conflicts of interest

Collaborators are in a conflict of interest when their independent and objective judgment to perform their responsibilities is limited, having to choose between the interest of TGI and/or GEB and their own, that of a third party, or that of a related party.

Collaborators must act objectively, transparently, and impartially in the performance of their duties, which means that they must refrain from acting in situations of potential or actual conflicts of interest and manage them per the rules set forth herein. These conflicts are defined as follows:

Personal conflict of interest:

There is a personal conflict of interest when our objectivity and independence are distorted by a relationship or potential personal relationship with people who are, or have been, close to me but with whom I have no blood, affinity, or civil connection.

For example, former co-workers, classmates, childhood friends, godparents or godmothers of marriage or children, among others.

Family conflict of interest:

A family conflict of interest occurs when our objectivity and/or independence is distorted by a relationship, or potential relationship, with relatives who are under the fourth degree of consanguinity, the third degree of affinity, the first civil degree, or with our spouse or permanent partners, in such a way:

Consanguinity

First degree:

Parents and children

Second degree:

Siblings, half-siblings, grandparents and grandchildren

Third degree:

Uncles and nephews

Fourth degree:

Cousins

Affinity:

First degree:

In-laws and sons-in-law or daughters-in-law.

Second degree:

Spouse's siblings, Spouse's brothers-in-law and sisters-in-law, and grandparents-in-law

Third degree:

Spouse's aunts, uncles, cousins, and great-grandparents

Civil relationship:

Adoptive parents and adoptive children

Economic conflict of interest:

An economic conflict of interest, whether potential or actual, arises when we are faced with relationships with individuals or legal entities with whom we have or could have some prior relationship of a patrimonial nature.

For example: Linking TGI and/or GEB as a supplier to a company of which you have some tie as administrator, shareholder, or any other type; or accepting to be an external advisor of a company with links with TGI and/or GEB, among others.

In any case, Collaborators must immediately inform their direct supervisor and the Compliance Department of any actual or potential conflict of interest situation in which they are or may become involved.

In case of doubts about the existence or not of a conflict of interest, a query must be submitted through the Ethics Channel for analysis.

Being in a conflict of interest does not constitute, in itself, a situation subject to sanctions; however, not reporting a conflict of interest promptly or not refraining from making decisions when involved in a conflict of interest may give rise to disciplinary sanctions following the applicable legislation in force in each country and in the respective Internal Work Regulations of TGI and other GEB companies.

In addition to the above, it is vitally important to emphasize that all recipients of this code must maintain a duty of loyalty to the organization and its administrators. For this reason, collaborators must refrain from obtaining any personal benefit at the expense of the company, specifically *(i) the use of company assets for purposes other than those for which they are intended, e.g., equipment, real estate, vehicles, offices, (ii) diversion of business that should reach TGI and/or GEB as a business attractor or its use, (iii) the use of information in an improper manner for personal benefit or that of a third party, among others.*

TGI and GEB collaborators must know, understand and fully comply with the Conflict of Interest Management Policy, which is permanently published on TGI's website:

<https://www.tgi.com.co/nosotros/gobierno-corporativo/politicas-corporativas>



Guidelines on gifts and hospitality

Corruption and bribery are not limited to money. Therefore, TGI and GEB's Administrators and Collaborators are prohibited from giving, offering, granting, promising, insinuating, accepting, and/or receiving gifts and/or attentions, including gifts, entertainment, benefits, courtesies, among others, with the purpose of influencing their decisions or generating undue advantages for Contractors or Suppliers or any other natural or legal person, according to what is stipulated in the Guidelines and Procedure for Gifts and Attentions, which is available for consultation in TGI's website:

<https://www.tgi.com.co/nosotros/programa-de-etica-y-cumplimiento>



d. Guidelines on donations, sponsorships, and political contributions

TGI and GEB have social programs through which contributions are made for charitable and humanitarian purposes, such as in natural disasters and humanitarian emergencies. It also participates in sponsorships whose sole purpose is to carry out advertising campaigns. To this end, sponsorships and donations must be duly approved and documented following internal procedures. They must not be used (or perceived to be used) to receive an undue commercial advantage in return, nor must they include resources that are diverted for non-corporate purposes. Donations must comply with the requirements of Article 355 of the Constitution.

Under no circumstances may sponsorships or donations in cash or cash equivalents be granted, including but not limited to: checks, loans, gift certificates or gift cards, or any benefit that can be exchanged for cash.

Likewise, TGI and GEB establish the prohibition for its Collaborators to grant, on behalf and in the representation of TGI and GEB, any political contribution, in cash or kind, to any national or foreign political party, as well as Politically Exposed Persons (PEP), or to carry out any type of political proselytism in TGI and GEB's facilities.

e. Relations with public officials

TGI and Grupo Energía Bogotá maintain relations with public officials based on legality, cooperation, and transparency. Collaborators who, due to their responsibilities, have any relationship with national or foreign public officials within the framework of TGI and GEB's activities must act professionally and comply with the applicable legislation in force.

Collaborators must inform if they are classified as Politically Exposed Persons or if their spouse, de facto or de jure, or a relative up to the second degree of consanguinity (father, mother, grandparents, grandchildren, children), the second degree of affinity, or first civil degree (spouse, father-in-law, daughter-in-law, son-in-law, spouse's child, brother-in-law) or what the legislation defines as such, are PEPs.

It is important to remember that the *Foreign Corrupt Practices Act (FCPA)* establishes the duty that we at TGI and GEB have adopted not to make payments to public officials, political parties, or candidates. Therefore, the FCPA makes it illegal to pay, offer, promise or authorize cash or anything of value (entertainment, gifts, donations, entertainment, among others), directly or indirectly, to any foreign public official to influence their decisions and obtain an advantage or business in return.

In all cases, facilitation payments and lobbying expenses are expressly prohibited.

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Prevention of money laundering, financing of terrorism, and financing of the proliferation of weapons of mass destruction (AML/CFT)

Money laundering, the financing of terrorism, and the financing of the proliferation of weapons of mass destruction are conducts that affect States and society in general since they allow or facilitate the concealment of money of illicit origin or destination and support organized crime.

TGI and GEB are committed to the prevention of risks associated with money laundering, financing of terrorism, and financing of proliferation of weapons of mass destruction that may arise in the development of their business activities.

Therefore, during the development of their specific functions and competencies, the Administrators and Collaborators of TGI and GEB must implement the controls established for the management of the risks associated with money laundering, financing of terrorism, and financing of the proliferation of weapons of mass destruction, including the due administration of the internal procedures for the knowledge of the Counterparties and the due diligence mechanisms through which, at least, the restrictive and control lists bonding Colombia and the countries where TGI and GBE operate are verified.

Likewise, Collaborators must be attentive to warning signs and must report through the Ethics Channel any event, real or probable, associated with money laundering, financing of terrorism, and/or financing of the proliferation of weapons of mass destruction. Likewise, they must report through the Ethics Channel any unusual or suspicious operation of which they become aware in the course of their duties. In case it is confirmed as suspicious or unusual, it must be reported by the Compliance Officer to the competent authorities.

Per the above, Collaborators must know, understand, and fully comply with TGI's SIPLA Manual, which is published on our website:

<https://www.tgi.com.co/nosotros/programa-de-etica-y-cumplimiento>



g. Contractual procedures

TGI and GEB promote integrity and transparency in the markets in which they participate and demand that all their Administrators and Collaborators comply with the applicable laws, rules, and regulations in the contractual procedures.

TGI and GEB only develop and execute contracts adjudicated in transparent processes and carried out within the framework of legality and in compliance with the current Contracting Manual. Information on competing companies in the selection and awarding processes must be obtained and used exclusively by legitimate means and for legitimate purposes, authorized by law, and compatible with the loyalty and respect imposed by TGI and GEB's good business practices.

h. Internal accounting

TGI and GEB handle their accounting in a reliable and systematized manner, through an internal control system that ensures the development of detailed and accurate processes and procedures for recording and reporting transactions and assets. Likewise, TGI and GEB safely keep all the support of the accounting records, having clear guidelines regarding information security and the access to it.

Collaborators whose duties include carrying out local or international transactions must follow the internal procedures established by TGI and GEB and must record them in their respective books. Any accounting or financial information that is, or has to be, reported, internally or externally, must meet the criteria of accuracy and precision.



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Information management

All information generated during the development of TGI and GEB's business activities is considered a valuable asset, so its protection is vital.

TGI and GEB understand that access to information must comply with the principles of transparency, good faith, non-discrimination, speed, efficiency, quality, and proactive disclosure. Therefore, Collaborators must adopt all appropriate measures to safeguard confidentiality and ensure access, understanding, and proper handling of the information they get to know in their duties and competencies.

Collaborators must refrain from using TGI's and GEB's information, including that which may be privileged and/or confidential, for purposes other than those expressly permitted by TGI and GEB. Likewise, they must keep strict confidentiality regarding negotiation processes, contractual processes, commercial relations, presentation of offers, professional secrets, and operations in the securities market, among others.

The improper use of privileged and/or confidential information may even be subject to legal sanctions of a criminal nature. Therefore, Collaborators must refrain from using such information contrary to TGI and GEB's internal policies for their own benefit or the benefit of any third party.

It is essential to highlight that all the information included in the servers, networks, devices, equipment, operating systems, corporate emails, corporate cell phones, or any other Information Technology (IT) or Operation Technology (OT) from TGI and GEB (software and/or hardware), is property of TGI and the Group. For this reason, it is subject to control, review, copy, and monitoring by the control areas, meaning the Compliance Department and the Internal Audit.

Collaborators must refrain from accessing and/or making improper use of the different technological accesses to computer systems or restricted sites, improper use of assigned system profiles, and violation of software licenses, emphasizing that users and passwords are personal and non-transferable.

Likewise, collaborators must refrain from producing, reproducing, storing, distributing, or commercializing copies of works, phonograms, videograms, books, or software protected by copyright or related rights without prior and express authorization from the respective owners under the applicable regulations. Moreover, they must refrain from using, reproducing, or exploiting a computer program or software license without the prior and express consent of the owner.

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Personal Data Protection

TGI and GEB are committed to the adequate treatment of the personal data of their information holders, complying completely with the regulations regarding Personal Data Protection. Given the above, TGI has a Personal Data Protection Program that guarantees the appropriate use and protection of personal data that is subject to processing by TGI in its capacity as Responsible for Processing Personal Data.

As a fundamental pillar of TGI's Personal Data Protection Program, TGI has a Personal Data Treatment Policy through which makes available to its owners the procedures and channels of attention established for the exercise of their rights of Access, Rectification, Cancellation or Opposition (ARCO); as well as the area responsible for processing their queries and/or claims, the purposes and forms of treatment, the validity of the databases, and the information of the Data Controller, among other aspects of vital importance in terms of Personal Data Protection.

In case of doubts about aspects related to the Protection of Personal Data processed by TGI, the owners of the information may contact the Personal Data Protection Officer, who is part of the Compliance Department, by e-mail at datospersonales@tgi.com.co.

Collaborators must know, understand, and fully comply with the guidelines outlined in TGI's Personal Data Protection Program, especially those in TGI's Personal Data Protection Policy.

Treatment of Personal Data, which is available at <https://www.tgi.com.co/datos-personales>



Anticompetitive practices

TGI and GEB promote the interests of the market in which it operates, as well as those of their consumers. Therefore, we reject any practice that limits or threatens free competition or affects the welfare of consumers, promoting healthy and fair competition in the market.

VII Sustainability

TGI and GEB have a Sustainability Policy, which defines the guidelines within the framework of sustainable management and governs other corporate policies,

TGI and GEB strive for sustainable management of their businesses and activities, aimed at the creation of social, economic, and environmental value, establishing the basis for adequate business performance and corporate decision-making.

TGI's and GEB's sustainability scheme seeks to carry out business activities based on trust and common benefit relationships, always within the framework of legality.

The following are TGI's and GEB's commitments regarding sustainability, which must be known and complied with by all Collaborators:

- **To have a sustainable value chain.**
- **To improve the quality of life in the communities where we operate. To be an excellent workplace.**
- **To care for and respect the environment.**
- **To provide a service with world-class standards.**

Additionally, following the commitment to international standards such as the ten principles of the United Nations Global Compact, TGI and GEB promote compliance with the following guidelines during the development of their business activities:

a Respect for human rights

One of the components of GEB companies' strategy is to comply with applicable laws and regulations, both domestic and foreign, regarding the promotion and protection of human rights.

Therefore, all TGI and Grupo Energía Bogotá collaborators must act with social responsibility and respect for human rights, generating assurances of a work environment in which dignity, respect, and integrity prevail, as well as fair treatment with adequate working conditions for all collaborators and care for their privacy, rejecting any situation of child labor, involuntary or forced.

Thus, it prohibits, rejects, and punishes all types of discrimination based on sex, gender, race, religion, nationality, and political affiliation, among others. In the same way, any situation of harassment (labor and/or sexual), threats, intimidation, and verbal, sexual, physical, and/or psychological abuse is prohibited, rejected, and sanctioned. Likewise, any retaliation for reporting these types of harassment is prohibited and rejected.

b Labor standards

TGI and GEB are committed to complying with the applicable laws and regulations, both domestic and foreign, in labor, occupational health, and industrial safety matters, generating assurances for a safe working environment, as well as for the freedom of assembly and association of Collaborators, and the right to collective negotiation, as well as to adopting proactive measures to prevent health and safety risks in the workplace and ensure fair and equitable remuneration.

Likewise, TGI and GEB promote and encourage gender equality, diversity, and inclusion.



c

Environmental protection and care

One of the pillars of GEB's sustainability strategy is the protection and care of the environment, which is why the following guidelines are mandatory for all employees of TGI and Grupo Energía Bogotá:

Compliance of applicable regulations and laws, both national and foreign, in the field of environmental protection and care.

Adoption of initiatives to promote greater environmental responsibility.

Implementation of an environmental responsibility policy.

Adoption of systems to measure and monitor environmental protection performance.

Reasonable and efficient use of natural resources in the development of business activities.

Adoption of proactive measures for pollution prevention and waste reduction.

Raising awareness of the importance of caring for the environment and natural resources in the development of business activities.

VIII Prevention and Rejection of sexual harassment

TGI and GEB reject any sexual harassment conduct. Harassment is any inappropriate or unwelcomed conduct that could reasonably be considered or perceived as a cause of offense or humiliation to another person in addition to that outlined in the definitions above.

Any form of harassment based on gender, gender identity and expression, sexual orientation, physical ability, physical appearance, race, nationality, political affiliation, age, religion, or any other reason is prohibited in TGI's and GEB's relationship with all its Counterparties.

Sexual harassment can occur through any type of conduct, whether verbal, nonverbal, or physical, including written and electronic communications, and can occur between persons of the same or different genders. The following is a non-exhaustive list of examples of sexual harassment:

Making derogatory or discriminatory comments about another person's sexual orientation or gender identity.

Using insulting or demeaning terms with sexual or gender connotations.

Making comments of a sexual nature about appearance, attire, or body parts.

Qualifying a person's sexuality.

Repeatedly soliciting a person for dates or sexual relations.

Unwanted touching of another person, including pinching, patting, groping, or intentional frictions.

Making inappropriate sexual gestures, such as lewd movements.

Send communications of sexual content in any format.

Sharing or displaying inappropriate sexual images or videos in any format.

Committing or attempting to commit an act of sexual assault, including rape.

IX

Ethical Channel and Complainant Protection

Collaborators must report through the Ethics Channel any violation of this Code of Ethics and Conduct, as well as any illegal or unethical act, misconduct, bad practices, and/or non-compliance with TGI's and GEB's internal policies and rules.

The Collaborators must provide as much information and evidence as possible to facilitate the internal validation and verification process. The activities or dissemination of unfounded rumors, submission of reports, or provision of deliberately false or misleading information will not be subject to follow-up or review by TGI and GEB and may result in disciplinary sanctions under the applicable legislation in force in each country and the respective Internal Labor Regulations of each GEB company.

The Ethics Channel is confidential, secure, and reliable. It is managed by an independent third party expert. The only area of the company that has access to this is the Compliance Department.

Reports may be made anonymously; otherwise, TGI and GEB guarantee the protection of the identity and confidentiality of the information contained in the report or query to the greatest extent possible. In addition, any type of retaliation resulting from a report or inquiry through the Ethics Channel is prohibited.

When a report or inquiry is made through the Ethics Channel, the case is assigned a case number. The Collaborator who makes a report or query must establish a password for follow-up or, if necessary, an extension of the information or question. The Compliance Department reports the results obtained from the preliminary verifications or investigations carried out, or the response to the respective consultation, through the same means.



Sanctions for non-compliance

Failure to comply with the provisions contained in this Code of Ethics and Conduct may result in disciplinary sanctions under the applicable legislation in each country and TGI's Internal Labor Regulations.

The foregoing, without prejudice to the legal, contractual, civil, administrative, and/or criminal penalties that may be applicable depending on the respective infraction.



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Definitions

Shareholders: Individuals or legal entities that have made a contribution in money or other appreciable assets in money to TGI and GEB in exchange for shares.

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, harasses, persecutes, pesters or besieges physically or verbally, for non-consensual sexual purposes, another person" (Article 210-A Colombian Criminal Code).

Senior Management: refers in its entirety to the Administrators, President, Vice Presidents, and Area Managers.

Administrators: Refers to the legal representative, the liquidator, the factor, the members of boards or boards of directors, and those who, according to the bylaws, exercise or hold these functions within TGI and GEB.

Ethics Channel: Mechanism that allows (i) reporting any violation of this Code of Ethics and Conduct, as well as any illegal or unethical act, misconduct, bad practices, or violations to the ethical framework of TGI and GEB that are carried out in the development of activities of the company and its Collaborators Group, (ii) reporting any breach of internal policies and rules of TGI and GEB, and (iii) a means by which consultations can be made and clarifications on ethical dilemmas can be requested.

Counterparties: Natural or legal persons with whom TGI and GEB have or intend to have a labor, legal, commercial, and/or business relationship in the development of their corporate purpose. Includes, but is not limited to: (i) Shareholders; (ii) Collaborators; (iii) Suppliers; (iv) Contractors; (v) Allies; and (vi) Customers or shippers.

Contractors: Natural or legal persons with whom TGI and/or GEB enter into a contract or service order to render services to GEB and/or TGI.

Collaborators: Individuals linked to TGI and GEB companies through an employment or apprenticeship contract, who provide their services under the subordination and in exchange for remuneration. Includes the Administrators.

GEB: Refers to Grupo Energía Bogotá S.A. E.S.P., its subsidiaries, and subordinates.

Stakeholders: Refers to natural or legal persons interested and/or affected by the business activities of TGI and GEB. Includes but is not limited to: (i) Counterparties; (ii) communities; (iii) markets.

Facilitation Payments: Payments to Public Officials to expedite the performance of non-discretionary duties, which are intended to influence the actions of the Public Officials, but not their outcome (e.g., payments made to obtain a permit or license).

Suppliers: Natural or legal persons with whom TGI and GEB have or intend to have a legal, commercial, and/or business relationship to provide goods, services, and/or products to TGI and GEB.

TGI: Refers to Transportadora de Gas Internacional S.A. ESP.

This code was **approved** by the Board of Directors of TGI S.A. ESP on **August 25, 2022**.

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