

CODE OF ETHICS AND CONDUCT SUPPLIERS AND CONTRACTORS



Energía para
prosperar

Contenido

Message form Presidency	1
Scope and compliance	2
General Guidelines	3
1. Ethics and corporate values	3
2. Duties and obligations of Suppliers and Contractors	5
3. Prevention of Fraud, Corruption and Transnational Bribery	6
4. Gifts and hospitality	7
5. Conflicts of interest	8
6. Prevention of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction	9
7. Processing of personal data	10
8. Information management	11
9. Sustainability	12
9.1 Human rights	13
9.2 Labor standards	14
9.3 Protection and care for the environment	14
10. Ethical channel	15
11. Penalties for non-compliance	16
Definitions	17
Acceptance of Supplier or Contractor	18



Message from the Presidency

Grupo Energía Bogotá, in achieving our higher purpose, in each of its actions as a business group has a consistent commitment to integrity, legality, ethics and transparency.

As companies and as people we relate permanently with our stakeholders based on constant and effective communication, based on our corporate values; We also adopt and honor a position of zero tolerance against any unethical and / or illegal conduct, in particular events of Fraud, Money Laundering, Financing of Terrorism, Financing of the Proliferation of Weapons of Mass Destruction, Corruption and Transnational Bribery, among others.

We are a Business Group that improves lives with 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 human team.

Our Suppliers and Contractors are fundamental in the achievement of our superior purpose, the respect of our corporate values, as well as in the effectiveness and transversality of our commitment to compliance 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 a duty to respect and comply with, responsibly, in all their interactions with TGI and the GEB and with their other Stakeholders. Only in this way will it be possible to build solid, sustainable, and transparent business relationships, based on trust and respect, and on the highest ethical and regulatory standards, which will allow us to obtain quality results, which will undoubtedly contribute to the institutional, economic, and social strengthening of the regions where we operate.

I invite you to give life to this document, in each of its actions and interactions, when making decisions, in your daily work and in your life in general, with coherence and integrality.

Scope

This Code of Ethics and Conduct for Suppliers and Contractors is a normative and consultation document, mandatory for all Suppliers and Contractors of TGI and GEB, whatever it may be, including, if applicable, their parents, subsidiaries and / or affiliates, as well as TGI and GEB collaborators who have within their functions the execution of the contracts to be signed with the contractors and who ensure the compliance with these within TGI and GEB. It is the responsibility of Suppliers and Contractors to adopt, honor and disclose this Code of Ethics and Conduct for Suppliers and Contractors with their employees and subcontractors, effectively verifying their communication 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 the other standards, policies and procedures of compliance and good practices of TGI and GEB, including, but not limited to: the Code of Ethics, the Internal Control and Prevention of Fraud and Corruption Policy, the SIPLA Manual, the Human Rights Policy, the Personal Data Processing Policy, the Information Security and Cybersecurity Policy and/or the Information Security and Privacy Model (MSPI), confidentiality agreements, among others.

The knowledge, socialization and acceptance of this Code of Ethics and Conduct for Suppliers and Contractors is a prerequisite to the conclusion of

all contracts, agreements, legal transactions, and other documents signed between TGI and GEB and the Suppliers or Contractors. In the case of Suppliers and Contractors who are unable to accept this Code and have their own compliance policies, they must contact TGI and GEB to evaluate them through the Compliance Department.

The standards of this Code of Ethics and Conduct for Suppliers and Contractors do not replace, but they complement, the provisions of any contract, agreement, or document between TGI, GEB and Suppliers or Contractors.

TGI and GEB reserve 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.



General Guidelines

1 Ética y valores corporativos

This Code of Ethics and Conduct for Suppliers and Contractors is based on the corporate values of TGI and GEB, which define the behavior expected by each of our Suppliers and Contractors.



Life First

It is the most important value, because it teaches us to take care of ourselves and the people around us, ensuring that everyone comes home safe and sound at the end of the day.



Integrity

It is the value that allows us to act coherently, uprightly, honestly, fairly and objectively; is the component that leads us to act in a transparent manner before TGI and GEB and before all our Stakeholders, in order to meet our objectives.



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 coupled with the mission of others, produces extraordinary results.



Result Oriented Approach

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



Empathy

This value teaches us the importance of respecting the views of all people, without discrimination and without being biased against beliefs, race, thoughts, and other factors, so that every day we can elevate our humanity.

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

Transparency:

refers to carrying out the management in an objective, clear and verifiable way, from the presentation of the offers in the contracting processes in TGI and the GEB.

Respect:

refers to interacting recognizing collective interests, individual diversity, the sustainability of natural resources and institutionality..

Equity:

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

Good faith:

refers to acting in your pre-contractual, contractual and post-contractual relationships with TGI and the GEB in good faith.

Legality:

refers to developing business activities subject to applicable laws, rules and regulations, as well as the conditions agreed in the contracting processes and in the contracts or agreements signed with TGI and the GEB.

Responsibility:

refers to making the greatest and best effort to achieve the 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 respond for them.

2

Duties and obligations of Suppliers and Contractors

The following are the duties and obligations of all Suppliers and Contractors, to which they must give full observance and compliance within the framework of any commercial and/or contractual relationship that may arise with TGI and the GEB:

Formulate offers with fair values.

Refrain from formulating offers with artificially low prices or violating good and healthy competitive practices.

Act in good faith, loyalty and cooperation, in the sense of providing information that should be known to TGI and the GEB in connection with the execution of contracts or related to any other type of information that may be of interest to TGI and the GEB and affect their reputation.

Report through the channels established for this purpose (Ethical Channel), any situation that may be considered or constitute a conflict of interest, whether personal, family or economic.

Refrain from providing false, inaccurate or misleading information

Ensure respect for the rules on copyright, intellectual property, information security, protection of personal data and other internal and external rules that must be complied with.

Report through the ethical channel any situation that may involve a violation of the ethical, legal and regulatory framework of TGI and the GEB, such as violations of the code of ethics and conduct, and other policies, illegal or unethical conduct, violation of internal procedures, among others.



3. Prevention of Fraud, Corruption and Transnational Bribery

TGI and GEB are committed to a zero-tolerance policy against Fraud, Corruption and Transnational Bribery.

It is for this reason that the Suppliers and Contractors of TGI and the GEB must have policies, standards or internal guidelines that allow them to identify, detect, evaluate, mitigate, monitor, investigate, prevent, manage, control and correct the risks of Fraud, Corruption, Transnational Bribery, and in general any unethical and / or illegal conduct in the development of their economic and contractual activity, and specifically in its relations with TGI and the 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, among others.

At a minimum, Suppliers and Contractors must:

Guarantee ethics, transparency, legality and good faith in its actions and business, as well as in the development of its activities and operations.

Guarantee that the monies or resources received from TGI and GEB within the framework of the respective relationship, will be destined solely and exclusively for lawful activities.

Implement the pertinent actions to detect, prevent, control and manage events of Fraud, Corruption and Transnational Bribery.

Mitigate legal, operational, reputational and economic risks arising from events or activities associated with Fraud, Corruption and/or Transnational Bribery.

Report to TGI immediately any event of Fraud, Corruption and / or Transnational Bribery through its Ethical Channel.

Refrain from offering, granting, promising, accepting, insinuating, receiving or soliciting from TGI and GEB Collaborators or national or foreign public officials, an undue advantage of any value either 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 in the relationship with their counterparts.

Guarantee and respect free business and economic competition, avoiding practices such as collusion, restrictive practices or cartelization, among others.

Manage your accounting in a safe, reliable and systematized manner, complying with the laws and regulations in force that are applicable, ensuring that the accounting records reflect in a truthful and reliable way the financial reality.

Perform Due Diligence and Know-your-client assessment to each subcontractor that is linked to the Supplier and / or Contractor, promoting contracting with counterparties that are not linked in investigations or with reputational damages related to acts of Corruption and / or Bribery.

In case of not having their own policies, standards or guidelines for the prevention and control of Fraud, Corruption and Transnational Bribery, or if these are insufficient within the framework of the relationship with TGI and the GEB, Suppliers and Contractors must adhere to the internal compliance policies and standards of TGI / GEB 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 the TGI and GEB standards.

In any case, in TGI and the GEB facilitation payments and lobbying expenses are expressly forbidden.

4 Gifts and hospitality



TGI's and GEB's Suppliers and Contractors are prohibited from offering, granting, promising, accepting, insinuating, receiving or soliciting gifts and hospitality from TGI and GEB Partners, except in the case of promotional items intended for brand positioning and brand recall, which are reasonable for this 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 TGI and GEB Administrators and Collaborators to events and/or celebrations, and they must follow the internal procedure defined for these situations in order to accept them. In addition, Suppliers or Contractors, as the case may be, will not be able to cover travel, stay and per diem expenses if required, which must be assumed by TGI or the 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 TGI and the GEB, for example, theater plays, tourist trips, places where women or men are used as a distraction or in a degrading way, among others, (b) that have as their object any demand, consideration or may represent a potential conflict of interest, (c) cash or equivalent, such as bonds (d) any attention that is perceived or reprehensible from the transparency and morality of good business practices.

In any case, contractors and suppliers must fully observe and comply with the policy and guidelines of gifts and attentions of TGI and the GEB.

5 Conflicts of interest

TGI's Suppliers and Contractors and the GEB are in a situation of conflict of interest when their independent and objective judgment is limited, having to choose in decision-making between the interest of TGI/GEB and their own, that of a third party or that of a related party. Suppliers and Contractors must act in good faith, transparently and fairly and impartially during the performance of contractual obligations and the functions entrusted to them, which means that they must refrain from incurring conflicts of interest.

In any case, TGI and the GEB expect Suppliers and Contractors to immediately evaluate and report, through the Ethical Channel, any real or potential situation of conflict of interest in which they are or may be immersed, as well as those of which they become aware within the framework of their relationship with TGI and / or the GEB.

Such conflicts are defined as follows::

Personal conflict of interest:

One is facing a personal conflict of interest when objectivity and independence is distorted by a relationship or potential relationship, with people who are or have been close, but with whom there are no ties of consanguinity, affinity or civil. For example, former co-workers, fellow students, childhood friends, godfather or godmother of marriage or children, among others..

Family conflict of interest:

It 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, third of affinity, first civil or with our spouse or permanent partners, as follows:

Consanguinity

First Grade: Parents and Children

Second Grade: Siblings, Half-Siblings, Grandparents, and Grandchildren

Third grade: Uncle and nephew

Fourth Grade: Cousins

Affinity:

First degree: In-laws and sons-in-law or daughters-in-law

Second degree: Siblings of spouse, brothers-in-law, sisters-in-law and grandparents of spouse

Third degree: Uncles, nephew, cousins and great-grandparents of the spouse

Civil kinship:

Adoptive parents and adopted children

Economic conflict of interest:

An economic conflict of interest, whether potential or real, materializes when we are facing situations of relationship with people, whether natural or legal, with whom we have some type of previous relationship of a patrimonial nature.

For example: Binding the GEB as a supplier to a company of which I am a legal representative, shareholder, board member or other, agreeing to be external advisor to a company that has links with TGI/GEB, or be Auditor and / or supervisor of contracts in which there is an interest of an economic nature, among others

6

Prevention of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction

The Suppliers and Contractors of TGI and the GEB must have internal policies, standards or guidelines that allow them to prevent, mitigate, control and manage the risks associated with Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, in accordance with the regulations applicable in the exercise of their economic activity. At a minimum, Suppliers and Contractors must:

Guarantee that the monies or resources received from TGI and/or the GEB within the framework of any contractual or commercial relationship will be used solely and exclusively for lawful activities.

Design and implement procedures for the knowledge of their respective counterparts and their Final and/or Real Beneficiaries.

Implement the pertinent actions to detect, prevent, control and manage suspicious events and/or operations of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction.

Mitigate legal, operational and economic risks derived from events or activities associated with Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction

Report any event of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction to GEB through the Ethical Channel.

Ensure proper knowledge of counterparties, through fully defined due diligence procedures, implementing greater diligence measures towards PEPs.

Execute basic Due Diligence mechanisms and intensified Due Diligence according to the level of risk that each counterparty represents.

Design and execute monitoring mechanisms on their counterparts.

Communicate and justify to TGI and/or GEB the need to subcontract any type of service or activity included in the contract signed with TGI and/or GEB.

Perform Due Diligence and counterpart knowledge to each subcontractor that is linked to the supplier and/or contractor, promoting contracting with counterparties that are not linked to restrictive lists both national and international or associated with crimes of Money Laundering, Financing of Terrorism or its associated crimes.

In case of not having the policies, norms or guidelines for the Prevention and Control of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction, or that these are insufficient in the framework of the relationship with TGI and GEB, Suppliers and Contractors must adhere to the TGI SIPLA Manual, which is published on the TGI website and can be consulted at the link:

<https://www.tgi.com.co/en/about-us/ethics-and-compliance-program>

7 Processing of personal data

In developing relationships with TGI and GEB, Suppliers and Contractors must comply with TGI's Personal Data Processing Policy and applicable regulations on the matter. The main objectives of TGI's Personal Data Processing Policy are:

Regulate the collection, storage, use, circulation, deletion, transfer and transmission of personal data by TGI.

Ensure that Suppliers and Contractors give full compliance with the processing of personal data.

Ensure that the holders of personal data can know, include, update, rectify, delete and revoke the authorization regarding the personal information that is processed by TGI.

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

Establish the guidelines that guarantee the protection of the personal data that are processed by TGI as the person in charge.

Report any security incident related to the exposure of personal data held in custody.

TGI's Personal Data Processing Policy is permanently published on TGI's website and can be consulted at the following link <https://www.tgi.com.co/en/personal-data-protection>.

As stated above, without prejudice to the fact that Suppliers and Contractors have policies, standards or internal guidelines that regulate the matter.



8

Information management

All the information generated within the framework of the relationships with Suppliers and Contractors is considered a valuable asset, so its protection is of vital importance. Therefore, TGI and GEB expect Suppliers and Contractors to take all appropriate measures to safeguard and manage properly and confidentially the information they become aware of within the framework of the relationship with TGI and GEB.

By way of example, Suppliers and Contractors are forbidden to:

Publish, without prior and express authorization, in whole or in part, the information of which they have knowledge within the framework of their relations with TGI and the GEB.

Use the information of which they have knowledge within the framework of their relations with TGI/GEB for their own benefit or that of a third party, to the detriment of TGI/GEB.

Use the information they become aware of in the framework of their relations with TGI/GEB to commit 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 TGI/GEB. Likewise, they must maintain confidentiality regarding negotiation processes, contractual processes, commercial relations, presentation of offers and operations in the stock market, among others.

In the event that they are required by any national or foreign authority, in relation to any contract they have with TGI and / or the GEB, the 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 the policies, internal standards and good practices of TGI and GEB.

In case of subcontracting, Suppliers and Contractors must request authorization from TGI and/or GEB to share or supply the information to the respective subcontractor.

Likewise, for all interactions they have with TGI and GEB networks, TGI and GEB Contractors and Suppliers have the obligation to previously have the mechanisms, software, in general, with all the elements of prevention and protection of information of TGI and GEB, in accordance with GEB's Corporate Information Security and Cybersecurity Policy and/or the Security and Privacy Model. of TGI's Information (MSPI). For this, they must ensure the repositories of the information, as well as have an information security system that has mechanisms to prevent information leakage, unauthorized copying, downloading and in general all the pertinent and conducive measures to guarantee the confidentiality and reservation of the information.

In case of not having their own policies, standards or guidelines for information security, or if these are insufficient within the framework of the relationship with TGI and the GEB, Suppliers and Contractors must adhere to the GEB Corporate Information Security and Cybersecurity Policy and the Information Security and Privacy Model (MSPI) of TGI, which is published on the TGI website and can be consulted at the link:

<https://www.tgi.com.co/en/our-business/risks-and-cybersecurity>



TGI and GEB seek that all their operations are framed within an area of sustainability, simultaneously seeking the generation of value for our shareholders and stakeholders and the improvement of the environmental environment in the territories where TGI and GEB have a presence.

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

- Protection of life and integrity.
 - Respect for human rights.
 - Transparency in the relationship with all its counterparts, including employees, representatives and/or administrators of TGI/GEB.
 - Ethical values and compliance.
 - Building shared prosperity.
 - Sustainability planning.
 - Operational excellence and environmental performance.
 - Timely social and environmental action.
 - Rights and obligations.
- Group action with a long-term vision.

In view of the above, it is of vital importance to emphasize that Suppliers and Contractors must 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.

and establish measures to prevent, address, punish and eradicate discrimination, violence and harassment in the workplace.

Recognize the individual and social importance of the right of association and collective bargaining and fully comply with the legal provisions aimed at its protection.

Guarantee the right to privacy and good name of its employees.

Protect the safety and health of all its employees.

Support the environment and biodiversity, favoring healthy environments in their areas of influence, and to initiate work towards the implementation of a human rights policy, comply with applicable laws and regulations, as well as with international standards regarding the respect 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 prevail.

Guarantee decent working conditions and reject practices of forced labor, as well as child labor exploitation.

Promote equal treatment and opportunities, without distinction 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 good name of its employees.

Recognize and respect the individual and collective rights of communities and any other interest group.

Recognize the individual and social importance of the right of association and collective bargaining and fully comply with the legal provisions aimed at its protection.

Protect the safety and health of all its employees.

Promote the protection of the environment and biodiversity, favoring healthy environments in their areas of influence.

To initiate work towards the implementation of a human rights policy.

As an integral part of the contract with TGI and/or GEB, Suppliers and Contractors must adhere to the TGI and/or GEB Human Rights Policy and must undertake to respect it.

9.2 Labor Standards

Suppliers and Contractors must:

Comply with applicable laws and regulations, both domestic and foreign, in labor, social security and occupational health and safety.

Ensure a safe working environment.

Take proactive measures to prevent health and safety risks in the workplace.

Promote employee well-being.

Encourage diversity, equity and inclusion in the company.

Promote direct contracting by reducing subcontracting as much as possible, except for activities that due to the nature, complexity and strategy are necessary.

Prohibit and sanction any discriminatory practice.
Promote local employment.

Promote local employment.

Validate the suitability and ability of its employees to carry out the contracted work activities.

Guarantee the freedom of assembly and association of its employees, as well as the right to collective bargaining.

Ensure fair and equitable remuneration by promoting equal pay for work of equal value.

Ensure a working environment and working conditions that respect the applicable legal provisions in terms of minimum wage, working hours, vacations, among others, guaranteeing the balance between work and personal life of its employees.

9.3 Protection and care for the environment

Suppliers and Contractors must:

Comply with all applicable laws and regulations, both domestic and foreign, regarding the protection and care of the environment.

Adopt 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 to measure and monitor environmental performance, especially in projects related to TGI and GEB.

Strive to implement actions for the reduction of greenhouse gas emissions, energy efficiency and carbon footprint compensation.

Adopt measures for the prevention of negative impacts on the environment, compensation of unavoidable impacts, and responsible waste management.

Strive for the use of materials and the implementation of environmentally friendly practices and technologies.

Direct their efforts to raise awareness about the importance of caring for the environment and natural resources in the development of business activities.

Train your employees on the importance of respecting and caring for the environment at least once a year, when the duration of the contract is longer than 12 months.

Seek to incorporate a sustainable sourcing policy applicable to its suppliers and contractors.

10 Ethical Channel

Suppliers and Contractors must report through the TGI 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, malpractices and/or non-compliance with TGI and GEB internal policies and rules. Suppliers and Contractors must inform their respective employees and subcontractors about the existence of the Ethical Channel, as well as about the obligation to report any potential irregularity.

It is necessary for Suppliers and Contractors to provide the most information and evidence to facilitate the verification process. Activities of transmitting or spreading unsubstantiated rumors, reporting or providing deliberately false or misleading information will not be subject to monitoring or review by TGI and the GEB; In addition, it will be classified as 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 TGI and the GEB.

The Ethical Channel is confidential, secure and reliable. It is administered by an independent expert third party. Reports can be made anonymously; otherwise, TGI and the GEB guarantee the protection of the identity and confidentiality of the information contained in the report or consultation to the greatest extent possible. In addition, any type of retaliation derived from a report or consultation through the Ethical Channel is prohibited.

When making a report or a query through the Ethical Channel, the case is assigned a filing number. The Supplier or Contractor that makes a report or query must establish a key to follow up or, if given, an extension of its report or query. The Compliance Directorate reports the results of preliminary verifications or investigations carried out, or the response to the respective query, through the same means.



11 Penalties for non-compliance

Failure to comply with the provisions contained in this Code of Ethics and Conduct of Suppliers and Contractors results in the implementation of corrective plans by TGI, which may range from the limitation to contract with TGI and / or GEB for a certain period, to termination for breach of the respective contract or agreement.

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

Definitions

Shareholders: Natural or legal persons who have made a contribution in money or other assets appreciable in money to TGI and / or GEB in exchange for shares in it.

Administrators: It refers to the legal representative, the liquidator, the factor, the members of boards or boards of directors and those who, in accordance with the statutes, exercise or hold these functions within the GEB.

Final Beneficiary: Refers to the natural person (s) who ultimately owns or controls, directly or indirectly, the natural and/or legal person on whose behalf a transaction is made. It also includes the natural person(s) who exercise effective and/or final control, directly or indirectly, over a legal person or other structure without legal personality and/or those established in the Colombian Tax Statute and/or the rules that modify or complement it.

Ethical Channel: Mechanism that allows (i) to report any violation of this Code of Ethics and Conduct of Suppliers and Contractors, as well as illegal or unethical act, improper conduct, bad practices and / or breach of policies and internal rules of GEB, and (ii) make inquiries and request clarifications on ethical dilemmas.

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

Collaborator: Any natural person linked to GEB through an employment or apprenticeship contract, who provides his services under subordination and in exchange for remuneration.

Corruption: It is 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 third parties, with the aim of guiding the conduct of someone to: (i) obtain or retain business, a profit or a commercial advantage; (ii) refrain from performing an act related to your duties or the duties of another person; and/or (iii) the abuse of your actual or alleged influence. Among the acts of corruption are the following crimes provided for in the Colombian Criminal Code or the regulations that modify or replace it, but are not the only ones: bribery for giving or offering; tax offences and other offences against the public administration; misuse of inside information; influence peddling by individuals; private corruption; unfair administration; agreements restricting competition; whitewash; illicit enrichment and illicit enrichment of individuals.

Fraud: Any intentional act committed to obtain an illicit gain.

Financing of Terrorism: Refers to the set of activities aimed at channeling licit or illicit resources, directly or indirectly, to provide, collect, deliver, receive, manage, contribute, guard or save funds, goods or resources, or perform any other act that promotes, organizes, supports, maintains, finances or economically supports organized crime groups, armed groups outside the law or their members, domestic or foreign terrorist groups, domestic 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, storage 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 subsidiaries and subordinates.

Stakeholders: Refers to natural or legal persons interested and/or affected by GEB's business activities. It includes but is 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 as a result of the execution of illicit activities or outside the law.

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

PEP: Politically exposed persons, that is, individuals who perform public functions of any system of nomenclature and classification of jobs of the national and / or territorial public administration that, by their position, issues rules, regulations or institutional policies; administers justice or has sanctioning powers, has the function of general direction and / or directly manage or administer assets, public money or securities. This definition also includes senior executives of state entities, high-ranking officials in political parties, the judicial branch and the legislative branch, heads of state and others who have had this capacity for two (2) more years from the resignation, resignation or dismissal of the position and / or those established in the regulations that regulate the matter.

Suppliers: Natural or legal persons with whom TGI/GEB may have a legal, commercial and/or business relationship for the provision of goods, services and/or products to TGI/GEB.

Transnational Bribery: Constitutive conduct in giving, offering or promising to a foreign Public Servant, directly or indirectly: (i) sums of money; (ii) objects of monetary value; and/or (iii) any benefit or utility, in exchange for that foreign Public Servant performing, omitting or delaying any act related to his functions and in relation to an international business or transaction.

TGI: Transportadora de Gas Internacional S.A. ESP

Acceptance by Supplier or Contractor

[Name of Supplier or Contractor], identified with the [citizenship card or NIT, depending on whether it is a natural or legal person], freely and spontaneously declare that:

1. I have received from TGI/GEB the Code of Ethics and Conduct for Suppliers and Contractors.
2. I am aware of applicable laws and regulations in force and I am committed to complying with them.
3. I will inform TGI/GEB, through the Ethical Channel, of any violation or suspected violation of the Code of Ethics and Conduct of Suppliers and Contractors, the internal policies and rules of good practices of TGI and GEB, the law and / or ethics, as well as any potential conflict of interest in which the company I represent, Your employees or managers are involved, as well as any conflicts of interest of which you are aware.
4. I will fully comply with the guidelines and parameters established in the Code of Ethics and Conduct of Suppliers and Contractors, as well as in the other internal rules of good practices of TGI and GEB.
5. I will disseminate this Code of Ethics and Conduct for Suppliers and Contractors with my employees and subcontractors and ensure that they also comply with it.

Name of Supplier or Contractor:

Identification number of the Supplier or Contractor:

Name of legal representative [in case of legal person]:

Identification number of the legal representative [in case of legal person]:

Date:

Signature



**Energía para
prosperar**



TGI

Grupo Energía Bogotá

Energía para
prosperar