

Suppliers and Contractors
Manual of Conduct of
Grupo EPM

Grupo·epm



In line with the strategy of **Grupo EPM**; aiming at establishing standards of conduct for its suppliers and contractors in legal, ethical, environmental, social, and governance aspects; as an expression of the corporate culture and the concept of extended enterprise; and considering its evolution, **Grupo EPM** issues this Manual of Conduct as part of the relationship with this stakeholder group.

The purpose of this document is to present the commitment of **Grupo EPM** to ethical standards and to communicate to all its suppliers and contractors the expectations regarding the ethical conduct they should maintain in the business relations with the group.

The execution of this Manual of Conduct is supported by the adoption of voluntary sustainability initiatives on topics such as corporate social responsibility, human rights, working conditions, environment, and fight against corruption; as well as by the business purpose of **Grupo EPM**, which focuses on sustainability.



In consequence, all legal or natural persons, whether national or foreign, related or linked to **Grupo EPM**, are invited to adopt the group's organizational culture and to align their actions with the statements containing the group's values and principles.

The commitments on conduct and ethics should not only be fulfilled within suppliers' and contractors' organizations, but also with their stakeholders.

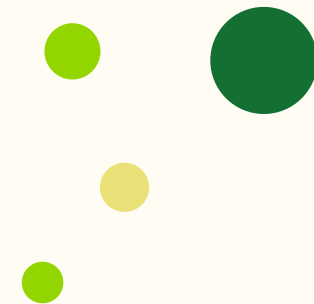
Grupo EPM reserves the right to modify this Manual of Conduct when it deems it appropriate. In this sense, suppliers and contractors are expected to accept any further changes.




1.

Human Rights

Suppliers and contractors of **Grupo EPM** should respect human rights and treat employees and any other person involved in the development of their activities in a decent and respectful manner. In consequence, they understand the following and agree to:



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- 1.1.** Reject and report child labor and commercial sexual exploitation of children and adolescents.
 - 1.2.** Reject and report any type of forced, compulsory, or coercive labor, including conditions of servitude, imprisonment, kidnapping, violation of the rights of migrant population, slavery, or human trafficking.
 - 1.3.** Reject and report any type of abuse or disrespect that threatens the dignity of employees, such as cruel, inhuman, or degrading behaviors; corporal punishment; discriminatory practices; physical, sexual, psychological, or verbal abuse; or arbitrary interference with privacy, family, home, or correspondence.
 - 1.4.** Encourage equal treatment among employees and stakeholders and reject any type of discrimination based on nationality, political opinion, economic status, race, gender, language, religion, sexual orientation, or disability. Likewise, reject any distinction due to the political, legal, or international status of the country or territory under whose jurisdiction a person falls.

1.5. Reject any action that may be construed as restricting the freedom of opinion and expression and the free personality development of employees.

1.6. In case of signing contracts and agreements for surveillance and security services, accept the explicit inclusion of commitments to respect and promote human rights. Under no circumstances shall these services be provided with the involvement of social actors outside the constitutional and legal framework.

1.7. Participate in the social development of the community and stakeholders. Be willing to foster and engage in discussion spaces where topics related to human rights are addressed.

1.8. When employees interact with ethnic communities, take the necessary measures to respect the traditions, customs, and cultures in their territories.



2.

Labor Standards



Suppliers and contractors of **Grupo EPM** should ensure a safe and healthy working environment for their employees. Therefore, they agree to:

2.1. Guarantee the fair and timely payment of the employees' remuneration established by law, including all the legal benefits and considering the maximum number of hours per day and per week defined by the applicable legislation.

2.2. Provide a clean, safe, and healthy working environment supported by an occupational health and safety program that mitigates psychosocial risk, in compliance with all established legal standards.

2.3. Protect employees and stakeholders from any chemical, biological, and physical risks and from tasks that involve great physical effort, as well as from risks associated with any element used by employees.



2.4 Adopt all appropriate controls, occupational safety processes, preventive maintenance, and technical protection measures necessary to mitigate health and safety hazards in the workplace. Where hazards cannot be properly controlled by these means, provide employees with appropriate personal protective equipment.

2.5. Acknowledge and respect employees' legal rights to associate freely, join unions, seek representation, join works councils, and participate in collective bargaining. In addition, respect employees acting as representatives of other employees.

2.6. Be open to learning about the strengthening and development programs and, depending on the capabilities and current situations of each supplier and contractor, participate in such programs.

2.7. Provide employees with adequate job-related training and offer educational opportunities, preferably during working hours.

3.

Quality and Environment



Suppliers and contractors of **Grupo EPM** should work with environmental effectiveness and responsibility and integrate quality into their corporate processes. To this end, they must:

3.1. Ensure the protection and recovery of the environment and the compliance with the national and international environmental regulations, the environmental legislation in force, and other laws, standards, resolutions, or agreements on environmental protection and conservation related to the company's activities. Similarly, be accountable for any consequences arising from the non-compliance with these regulations and provisions.

3.2. Comply with all the generally recognized or contractually agreed requirements and regulations on quality that apply, in order to provide functional and safe goods and services that consistently meet the needs of **Grupo EPM**.

- 3.3.** Consider the promotion of best practices and continuous improvements in all operations and processes, in order to exceed the legal requirements and the market standards.
- 3.4.** Use materials and processes that contribute to environmental sustainability.
- 3.5.** Take into account the importance of participating in universally accepted initiatives and trends related to environmental protection and conservation.
- 3.6.** Obtain and keep up to date all necessary permits, licenses, registrations, and restrictions related to this matter.
- 3.7.** Establish or use a reasonable environmental management system.



4.

Prevention of fraud, corruption, and bribery

Suppliers and contractors of **Grupo EPM** should conduct their business ethically and honestly. Therefore, they undertake to:

4.1. Manage with transparency, austerity, and integrity the resources granted, allocated, or delivered in custody, understanding the public nature of **Grupo EPM** and its corporate management.

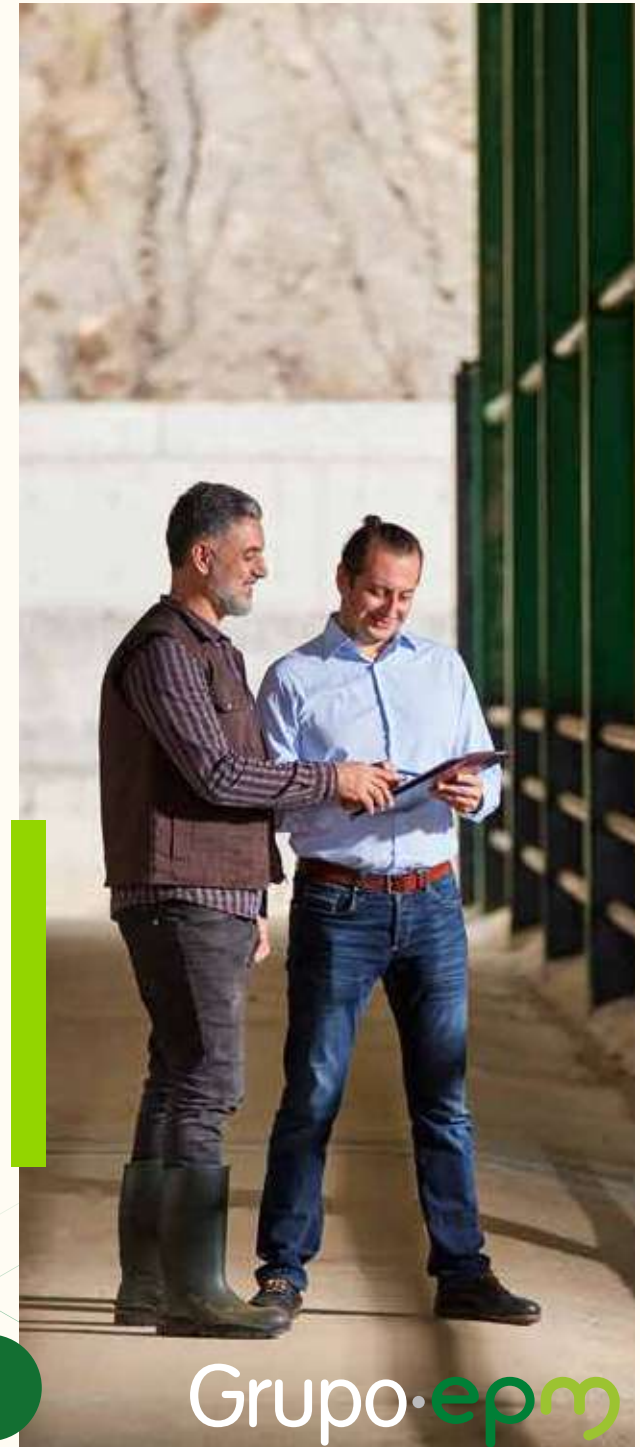
4.2. Meet the requirements established and the conditions agreed in contracting processes, acting with integrity, impartiality, honesty, and sincerity and complying with all laws and regulations applicable to the organization or business.

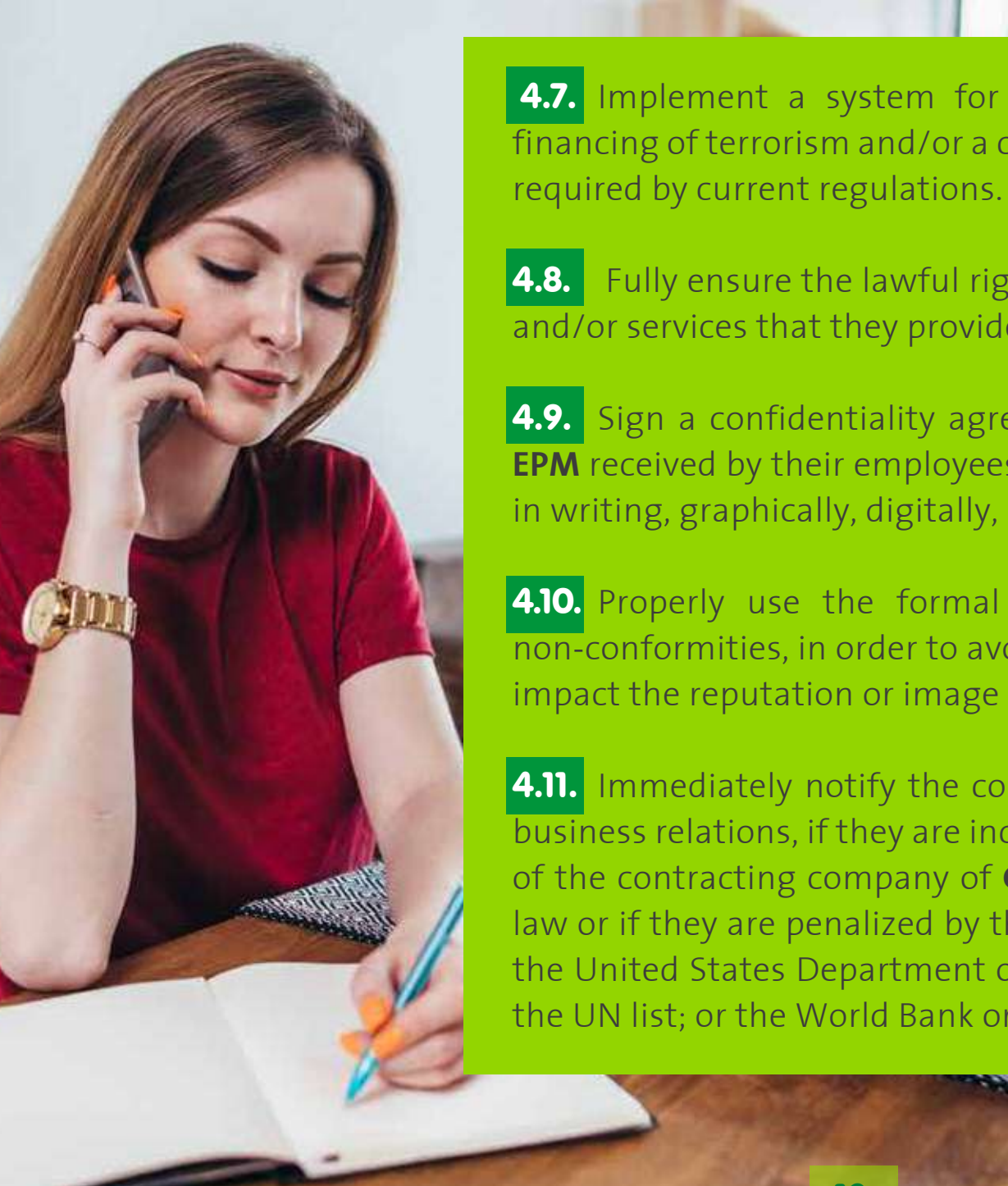
4.3. Avoid any type of undue influence, bribery, or unethical behavior that goes against the institutional values.

4.4. Refrain from giving or offering money, securities, gift cards, convertible bonds, debit cards, among other considerations, in order that persons with authority in the existing relationship do or fail to do something related to their duties or use the influence of their position before another officer, public servant, employee, or collaborator of **Grupo EPM** with the corresponding authority so that they do or fail to do something related to their duties.

4.5. Avoid giving gifts or offering invitations, favors, or benefits that may influence the impartiality of the employees of **Grupo EPM** or that may result in a binding situation with a third party, except for promotional items provided as a courtesy in business relations.

4.6. Abstain from establishing relations with illegal groups and social actors outside the law and the Constitution. Have proper control mechanisms to prevent the materialization of risks related to money laundering, financing of terrorism, fraud, and corruption.





4.7. Implement a system for the prevention of money laundering and financing of terrorism and/or a corporate transparency and ethics program, if required by current regulations.

4.8. Fully ensure the lawful right of property and/or ownership of products and/or services that they provide.

4.9. Sign a confidentiality agreement on all the information about **Grupo EPM** received by their employees or advisors, directly or indirectly, verbally or in writing, graphically, digitally, or through any other means.

4.10. Properly use the formal mechanisms to make complaints or file non-conformities, in order to avoid oral and/or written proceedings that may impact the reputation or image of **Grupo EPM**.

4.11. Immediately notify the company of **Grupo EPM** with which they have business relations, if they are included in binding lists of the country of origin of the contracting company of **Grupo EPM** in accordance with international law or if they are penalized by the Office of Foreign Assets Control (OFAC) of the United States Department of the Treasury—also known as the SDN List; the UN list; or the World Bank or Inter-American Development Bank (IDB)

lists. In case of legal persons, this item applies whenever this situation occurs to any partner or shareholder that directly or indirectly owns more than five percent (5%) of shares or stocks, or regardless of the percentage in the case of controlling partners or shareholders, as well as when this situation occurs to members of the board of directors or legal representatives.

4.12. Report through the Contacto Transparente (Transparent Contact) ethics hotline when they become aware of any possibly or allegedly wrongful act by a collaborator or contractor of **Grupo EPM**.

4.13. If applicable, comply with the United States Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and all the local laws on bribery of national or foreign government employees.

4.14. Refrain from giving public servants, employees of state-controlled institutions, political parties, or political campaigns any money or valuable items, either directly or indirectly, with the purpose of obtaining an improper advantage or benefit.

4.15. Keep a detailed record of all payments made (including gifts, meals, courtesy invitations, or any other valuable item) by virtue of the contract



signed with any of the companies belonging to **Grupo EPM** or with any of the funds provided by such company of **Grupo EPM**, in case a copy of this record is requested.

4.16. Keep a documentary record of all the meetings held and negotiations conducted with collaborators of **Grupo EPM** or third parties so that they are transparent and carried out under ethical standards. The record should include at least the following: attendees, place, starting time and ending time, date, addressed topics, and conclusions.

4.17. As a transparency and integrity commitment, timely declare and inform the company of **Grupo EPM** with which a contractual or business relation has been established about any potential or actual conflict of interest involving their employees, directors, members of the board of directors, or tax auditor.



5.

Information Protection



Suppliers and contractors of **Grupo EPM** should manage information appropriately under the provisions of law. Therefore, they should:

5.1. Fully comply with the existing regulations on protection of personal data to which they may have access by virtue of the business relations with **Grupo EPM** and other third parties.

5.2. Assume the role of data controllers (when, by themselves or in association with others, they decide on the processing of personal data) or data processors (when, by themselves or in association with others, they perform the processing of personal data on behalf of data controllers) of the personal data (user information, family group, housing conditions, socioeconomic data, among others) of employees or any other members of the stakeholders of **Grupo EPM** to which they access. Consequently, assume the obligation to obtain consent for the purpose of the service, protect such personal data, and fulfill their obligations as controllers (or processors) in accordance with the applicable law.

5.3. Take security, confidentiality, restricted access, and non-assignment measures in relation to personal data to which they may have access, regardless of the processing method, and provide special protection to sensitive data, whenever they access this type of information while executing their contractual duties for **Grupo EPM**.

5.4. Observe the third-party confidentiality and intellectual property clauses and refrain from using the brand or image of any of the companies that make up **Grupo EPM**.



6.

Fair Competition Practices




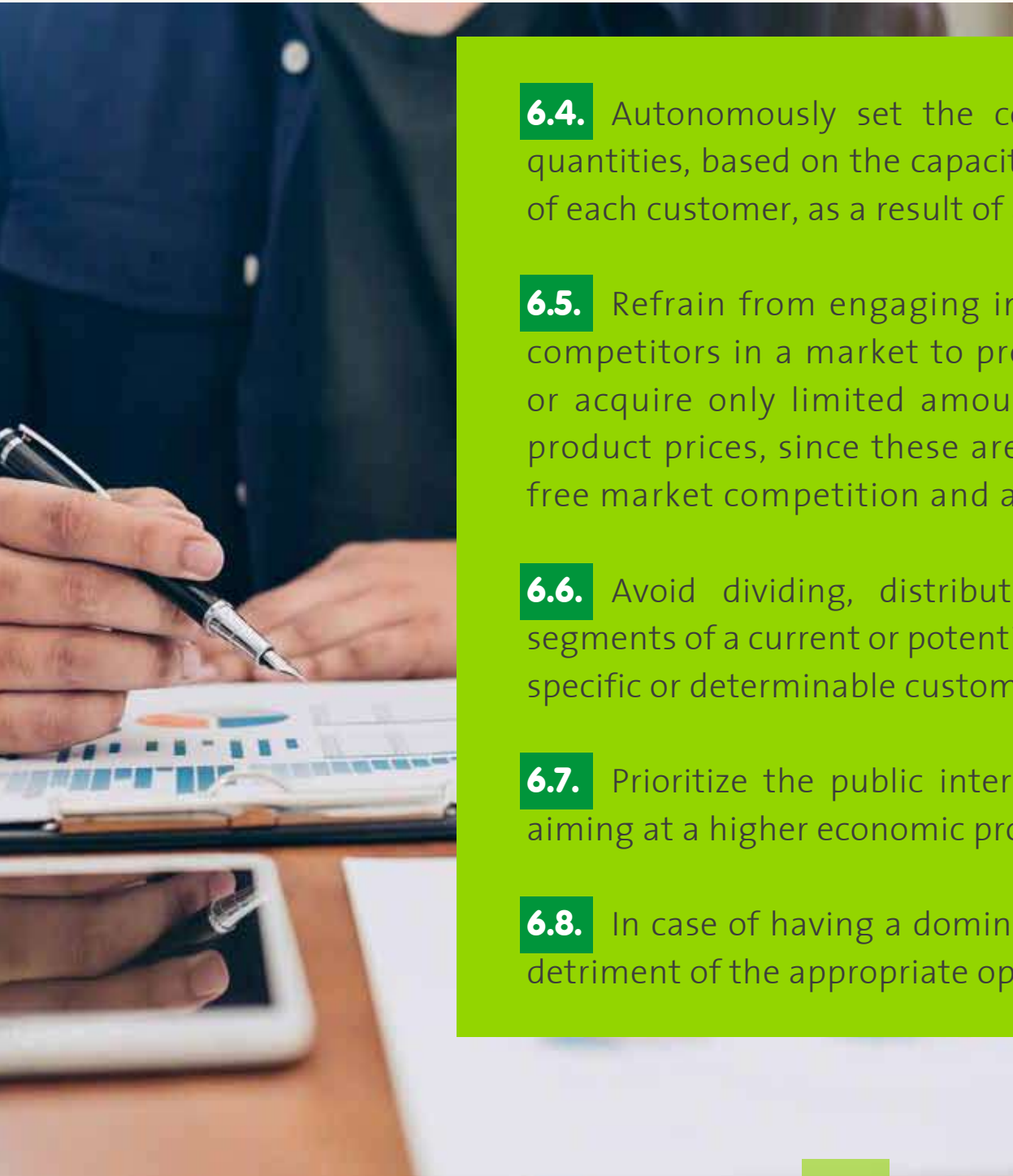
Suppliers and contractors of **Grupo EPM** should conduct businesses where transparency is the main value and principle of every action; consequently, they should participate only in markets that comply with the antimonopoly and fair competition laws worldwide.

Therefore, suppliers or contractors of **Grupo EPM** agree to:

6.1. Consider the possibility of establishing strategic partnerships or acquisitions that ensure efficiency and consolidate market shares, accepting the merger terms and signing the documents to protect the parties before executing any agreements or acting jointly.

6.2. Where possible, enter into agreements that establish terms for a proper exchange of information among competitors, observing the competition standards and creating fair teams , if necessary.

6.3. Respect the sale or purchase prices at which goods or services are offered or demanded in the markets, avoiding setting, arranging, or manipulating such prices.



6.4. Autonomously set the conditions of sale, such as deadlines and quantities, based on the capacity and needs of the company and the needs of each customer, as a result of a negotiation process.

6.5. Refrain from engaging in monopolistic practices aimed at forcing competitors in a market to produce, process, distribute, commercialize, or acquire only limited amounts of goods and services to manipulate product prices, since these are considered unfair practices that prevent free market competition and are forbidden by law.

6.6. Avoid dividing, distributing, assigning, or imposing portions or segments of a current or potential market of goods and services by means of specific or determinable customers, suppliers, times, or spaces.

6.7. Prioritize the public interest, consumers, and competitors, not only aiming at a higher economic profit.

6.8. In case of having a dominant position, abstain from abusing it to the detriment of the appropriate operation of the market.

6.9. Refrain from establishing, arranging, or coordinating cover bidding in calls for bids, tenders, or auctions.

6.10. Act independently from competitors by making a reasonable analysis of the most convenient way to behave, that is, abstain from making arrangements with other market agents or from using a dominant position to hinder or prevent other agents from accessing the markets.

6.11. Treat customers that share the same features equally, providing them with the same conditions, that is, avoid discriminating against a customer for reasons other than businesses, on a whim, or because of the idea of obtaining a higher profit.





Each supplier and contractor of **Grupo EPM** is responsible for guaranteeing that persons directly involved in the development of their activities understand and fulfill this Suppliers and Contractors Manual of Conduct of **Grupo EPM**.

Any violation of this Manual by any suppliers or contractors of **Grupo EPM** may be sufficient reason to end the relation with them depending on the seriousness of the violation and the particular circumstances.

Acceptance of terms

When suppliers and/or contractors select in this information system the option to accept the terms, it means that they guarantee that the Suppliers and Contractors Manual of Conduct of **Grupo EPM** has been read, understood, and observed. They authorize **Grupo EPM** or a third party hired by **Grupo EPM** to perform random audit, control, or inspection activities in order to verify the compliance with this Manual and identify recorded legal and/or reputation risks or any kind of disqualification or incompatibility that prevents them from entering into any contracts with any of the companies of **Grupo EPM**, in accordance with the equivalent provisions in the country where the contractual relationship will take place and the provisions applicable to foreign suppliers in their country of origin, which are grounds for elimination of the offer or early termination of the contract.