Measurement of policies and mechanisms of corporate transparency
Companies of public services - 2012

<table>
<thead>
<tr>
<th>Name of the Company</th>
<th>Empresas Públicas de Medellín S.A E.S.P</th>
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<tr>
<th>Sector</th>
<th>Total score</th>
<th>Sector’s score</th>
<th>Total MTE</th>
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<tbody>
<tr>
<td>Energy and gas</td>
<td>86</td>
<td>78</td>
<td>67</td>
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Components, opening and dialogue

Strengths:

- EPM has a clear policy regarding communications, developed through internal and external regulations that were submitted clearly and in a timely manner through various channels to all the interested groups.

- The relevant delivery of information to the interest group of shareholders and investors (in the case of the Company to the Municipality) through different channels being monitored to prove their suitability. Relevant information has to do with accounting and financial aspects, company’s risk management and business itself.

- EPM gave clear, true and pertinent information to the interest group of clients, regarding the CCU, invoices, changes in the environment related to the cancellation or scheduled outages of services, as well as information regarding the proper use of the service, and safety and health issues while using it.
- The company monitors the impact that the information delivered related to the hiring plan and guidelines of hiring has on the interest group of suppliers and/or contractors.

- Delivery of relevant information to the interest group community and/or society related to the impact originated in performance, fulfillment of social investment plans and programs intervening the community.

- Customer Service System, which is permanently being supervised.

- Even though in 2011 the Company hadn’t implemented the Suppliers development policy, it was clear that the company carried out regulated actions of dialogue and interaction with this interest group, using several channels, monitoring their appropriateness and constantly informing this interest group about their actions.

**Opportunities for improvement:**

To monitor the impact that the relevant information has on the interest groups when the information is delivered. Taking this into consideration it is important for the Company to know how the costumers interest group receive information about changes in the environment, safety and health.

The Measurement of corporate transparency acknowledges and demonstrates the good actions that EPM has been performing with the suppliers' interest group under the framework of the Suppliers development policy that was in the process of being approved by the Company’s Board of Directors when the validation was carried out.
Components, clear rules and control

**Strengths:**

- Through Decree 1807 of 2011, EPM created the Ethics committee as a mechanism of responsible integration and as a promoter of ethical management through developing the Company’s Ethics Code.

- Code of Corporate Governance in which the entire regulation corresponding to the Board of Directors is applied, as well as relevant information in accordance with international standards.

- Evaluation of the sessions and members of the Board of Directors.

- Through the unit of compliance, insurance and the area of risk management, EPM has been working on a map that illustrates the corruption risks in the company, alongside the risk management inherent to their work, in order to prevent possible risks of residual corruption, to close gaps, and to meet the guidelines of the Anti-corruption Statute in a timely manner.

- A Human Resource Management Policy that contributes in a sustainable way to the development of the interest group. This policy is developed through coverage guidelines, evaluation of performance, organizational climate and training, among others.

- EPM encourages spaces of interaction with control members through community exercises and capitulation of accounts; additionally the company gives them a relevant space in the Board of directors. Moreover the company encouraged and participated in interaction spaces with citizen oversight as a responsible exercise of social control.
The company developed training and socialization programs with interest groups, in subjects related to popular participation and the struggle against corruption.

**Opportunities for improvement:**

- To strengthen the Ethics Code of the company with aspects established in the international standard making the regulatory reference of aspects such as declarations of conflict of interests in the different decision-making stages within the company, management and veracity of information, sanctioning component in possible cases of non-ethical facts or transgressions to the Code.

- To formalize the policy of transparency and fight against corruption, aspect that is intrinsic to the organizational culture, but that is recommended to be promulgated and adapted corporately as a practice of good governance.

- To articulate guidelines and social inclusion programs to the Human resource management policy, according to the Company’s programs of sustainability and RSE.