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## Chapter 1 Message from our General Manager

As the General Manager of CTG Colombia Holding S.A.S. and Kinich Energía Holding S.A. de C.V.(hereinafter “**CTG Latam**”), I reaffirm my absolute commitment to ethics and transparency. I also encourage all stakeholders, employees, and partners to internalize, comply with, and actively promote the principles, values, and best practices of our Code of Ethics and Conduct with full conviction and dedication.

In the spirit of transparency, integrity, responsibility, and respect for our principles, at CTG Latam, we uphold a Code of Ethics and Conduct that guides and inspires the appropriate actions of all those who are part of this holding of China Three Gorges Corporation and those we interact with. In this code, we declare our commitment to promoting and defending human rights, fulfilling national and international commitments, supporting inclusion and diversity, and fostering coexistence, while rejecting all forms of discriminatory behaviour, bribery, and corruption.

Under the principle of integrity and responsibility, we enforce a directive of "zero tolerance" towards corruption, fraud, bribery, activities associated with money laundering, terrorism financing, support of illegal groups, the construction or proliferation of weapons of mass destruction, or any violation of national or international regulations. Likewise, we reaffirm that practices driven by conflicts of interest or ethical concerns, those that restrict fair, free, loyal, and objective competition, facilitation payments, political contributions and donations, and the misallocation of funds intended for social investment or

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sponsorships to political activities or purposes unrelated to the company's objectives, are absolutely prohibited.

## Chapter 2 General Provisions

### 1. Purpose

The Code of Ethics sets the behavioural standards for employees in the performance of their contracted duties, ensuring that tasks are carried out with dignity, fairness, and ethics. Its purpose is to prevent and report any conduct that disrupts the work environment, violates corporate principles, abuses human rights, or involves suspicious activities that could harm stakeholders, the company's reputation, or its good name. This code aims to improve the corporate governance structure of CTG Latam, guide and standardize the functions of our executive committee and directors, and effectively safeguard the company's interests and positive image in both the national and international markets, in compliance with relevant laws and regulations.

### 2. Scope

The Code of Ethics and Conduct applies to: i) all employees of CTG Latam and its subsidiaries; ii) clients, regardless of the contractual arrangement; iii) suppliers; iv) contractors; and v) in general, all stakeholders with whom the company establishes, either directly or indirectly, any commercial or contractual relationship.

### 3. Definitions

- **Benefit:** A good or advantage given to or received by a worker, which involves an action or is the result of it and can benefit one or more employees while meeting a need.
- **Corruption:** Any act, attempt, or deliberate omission to obtain a benefit for oneself or third parties to the detriment of business principles, regardless of the financial effects on the company. These actions are represented in the following forms:
  - **Internal:** Acceptance of bribes from third parties by company employees, in exchange for decisions, actions, or omissions that benefit the third party.
  - **Corporate:** Acceptance of bribes by company employees towards government officials or third parties, either directly or through agents, to influence the third party's decisions, actions, or omissions in Favor of the company or its employees.
- **Conflict of Interest:** A situation where business, financial, family, political, or personal interests could interfere with an employee's judgment in fulfilling their obligations to the organization.
- **Due Diligence:** The process of evaluating in greater detail the nature and scope of bribery risks, helping organizations make informed decisions regarding transactions, projects, activities, business partners, and specific personnel.
- **Facilitation Payment:** Payments or advantages of any kind made to accelerate or facilitate the performance of a task by a company employee.
- **Fraud:** The intentional act or omission designed to deceive others, carried out by one or more persons to unlawfully appropriate, exploit, or obtain another's property—whether material or intangible—at the expense of others, usually due to the victim's ignorance or deception.
- **Confidential Information:** All non-public information in the possession of the company related to business, including but not limited to contracts, pricing information, marketing plans, trade

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volumes, client identities, operations, technical specifications, trade secrets, and any other information of commercial value to any individual, communicated by any means, whether oral or electronic, and whether or not marked, designated, or otherwise identified as “confidential.”

- **Gratification:** A type of remuneration defined as a portion of the company’s profits that benefits the employee’s salary.
- **Misconduct:** Any illegal or inappropriate behaviour in violation of company policies, guidelines, the code of ethical conduct, and procedures carried out by an employee within the company.
- **Compliance Officer:** The person designated by the company responsible for promoting, developing, and ensuring compliance with specific procedures for risk prevention, updates, and mitigation.
- **Facilitation Payment:** A term sometimes used to describe an illegal or unofficial payment made in exchange for services the payer is legally entitled to receive without making such a payment. It is typically a relatively small payment made to an employee to secure or expedite a necessary process or action, such as onboarding a business partner or handling a purchase or acquisition.
- **Extortion Payment:** Money taken by force from an individual due to real or perceived threats against their health, safety, or freedom.
- **Stakeholder:** A person or organization that may affect, be affected by, or perceive themselves as affected by a decision or activity.
- **Bribery, Fraud, Corruption Risk:** The potential for the company to be involved in loss or damage by being used, directly or indirectly, through its representatives, activities, or operations, as an instrument to commit corruption, fraud, embezzlement, or bribery. The risk materializes through offenses associated with the interests or benefits of the legal entity, committed by individuals functionally related to the company.
- **Bribery:** The offering, promising, giving, accepting, or soliciting of an undue advantage of any value (which may be financial or non-financial), directly or indirectly, and regardless of location, in violation of applicable law, as an incentive or reward for a person to act or refrain from acting in relation to their duties.
- **Transnational Bribery:** The act in which the company, through its employees, directors, associates, contractors, or subsidiaries, gives, offers, or promises to a foreign public official, directly or indirectly: (i) sums of money, (ii) items of pecuniary value, or (iii) any benefit or utility, in exchange for that official to perform, omit, or delay any act related to their duties in connection with

### Chapter 3 Business Principles

The Code of Ethical Conduct establishes principles that must be incorporated into employees' behaviour when performing their duties in the position they were hired for, whether representing or acting on behalf of the company at any level.

#### 1. Integrity

Act honestly, lawfully, transparently, and consistently in both thought and action, in accordance with the company's policies, regulations, and applicable legal framework.

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## 2. Transparency

Be sincere in actions, thoughts, and words; behave clearly, with a willingness to have one's conduct subject to clear rules and regulations.

## 3. Honesty

Be aware of one's responsibilities and moral, legal, and work-related obligations, and practice them.

## 4. Compliance

Adhering to procedures, policies, and regulations is also an essential part of the discourse on integrity and ethics and is therefore addressed in this manual.

### Chapter 4 Business ethics values

The company's ethical values define its identity and guide the decisions and behaviours of its managers and employees, creating a culture within our company that serves as a point of reference for our stakeholders.

- **Efficiency:** The worker's ability to properly use work tools to achieve the objectives of their role or process.
- **Respect:** The worker's ability to consider opinions, ideas, viewpoints, personalities, and different attitudes or behaviours that are important for harmonious coexistence, such as following the company's policies and guidelines.
- **Quality:** A constant commitment to improvement, attention to detail, and delivering services that exceed customer expectations.
- **Trust:** A worker's ability to act appropriately in each situation or circumstance in relation to the activities performed in their role.
- **Commitment:** The worker's ability to fulfil their obligations, goals, or tasks assigned to them in their role.
- **Ethics:** The worker's conduct in performing their duties during interactions with stakeholders, which will be based on the company's guidelines, policies, procedures, and internal regulations.
- **Service:** A worker's aptitude to meet the needs and expectations of the stakeholder.
- **Punctuality:** A worker's ability to be on time and meet the commitments related to their role.
- **Loyalty:** A worker's aptitude to comply with laws, regulations, company policies, and procedures.

### Chapter 5 Work Environment and Corporate Responsibilities

CTG Latam aims to provide a safe and healthy workplace that values diversity, respects privacy, and upholds human rights.

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## 1. Work environment

### 1.1 Harassment and abusive conduct

CTG Latam protects the fundamental dignity of all its employees and does not tolerate any form of harassment or abusive conduct in its workplaces. This includes acts or threats of violence, such as gestures, language, and physical contact toward an employee, intentional damage to company property, or any other behaviours that makes others feel unsafe in the workplace.

Furthermore, the company does not tolerate retaliation against any employee who reports harassment or participates in an investigation.

### 1.2 Discrimination

CTG Latam is committed to supporting equal employment opportunities and diversity. Personnel selection, hiring, and review activities will be carried out with respect for each worker's individuality, without discrimination based on sex, race, religion, gender, national origin, age, disability, political or religious beliefs, marital status, sexual orientation, or family responsibilities. Hiring and promotion decisions will be based on merit.

### 1.3 Protection of children and adolescents

CTG Latam does not hire or encourage the employment of child labour. Preventive measures are implemented in the selection and hiring processes to ensure compliance with the minimum age established by applicable national legislation

### 1.4 Forced Labor

CTG Latam prohibits all forms of slavery or forced labour, including working conditions in which individuals cannot refuse to work due to coercion, threats, or abuse of power

### 1.5 Working conditions

CTG Latam promotes healthy work environments and appropriate conditions for the development of operations, complying with the necessary environmental requirements.

### 1.6 Social and Environmental responsibility

The company, in its policy CTGL-AD-PO-006 Corporate Social Responsibility Management, reaffirms its commitment to corporate social responsibility and its dedication to positively contributing to the communities where it operates. Additionally, it emphasizes its environmental responsibility, ensuring the sustainable use of resources, reducing environmental impact, and respecting current regulations to preserve the natural environment.

## 2. Confidential information, Data protection and privacy

### 2.1 Confidential information

All employees must safeguard the information they handle in the course of their operational activities, including that of clients, suppliers, and third parties, which is considered confidential. Confidential information should not be disclosed to anyone outside the company, including family and friends, unless required by law.

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Failure to protect this information may result in a violation of obligations arising from contracts or laws that protect trade secrets, data protection, and privacy.

## 2.2 Sharing of Confidential Information

Confidential information should only be shared within the company on a "need-to-know" basis. All employees are obligated to protect such information, even after their employment or business relationship has ended.

## 3. Data protection and privacy

The company respects and protects the privacy of its employees, clients, and business partners. Personal information is processed fairly and lawfully, in compliance with applicable data protection laws. It is securely stored, and precautions are taken to prevent unauthorized disclosures.

Additionally, the CTGL-LC-PO-006 Data Protection Policy and CTGL-LC-PO-007 Data Processing Policy set out the guidelines and policies defined by CTG Latam regarding data protection and handling

## 4. Health and Safety at work

CTG Latam has a health and safety system in place, aimed at providing a safe and healthy environment for its employees, complying with all applicable laws.

Employees also have responsibilities outlined in this system, and each member of the company is expected to follow the prescribed health measures and be responsible for their own safety. They also have the right to withdraw from dangerous situations or operations where there is an imminent and serious risk to their safety.

## 5. Guidelines for relations with stakeholders

### 5.1 Employees

- Promote decent work based on fundamental labor principles and rights.
- Respect human dignity and the inalienable rights of workers, in accordance with national laws.
- Foster a culture of respect, assertive communication, and teamwork.

### 5.2 Clients

- Treat clients with transparency and ethics.
- Ensure that the products and services offered meet the agreed-upon quality.

### 5.3 Providers

- Maintain fair and ethical relationships with suppliers.
- Promote long-term relationships based on mutual growth and business development.

### 5.4 Competition

- Comply with fair competition laws and respect intellectual property and data protection.

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## 5.5 Government

- Act with transparency and responsibility in public procurement, adhering to legal requirements

## 6. Conflict of interest

All company members, regardless of their position, must ensure that the decisions made in the performance of their duties are in the company's best interest. Conflicts of interest must be reported to the designated department to ensure ethical and unbiased decision-making.

## 7. Antitrust laws

The company will comply with applicable laws and guidelines, adhering to fair competition regulations (also known as "antitrust laws") and maintaining behavior that prevents violations of these laws.

## 8. Contracts

CTG Latam sets forth the guidelines for the contracting process in the CTGL-LC-PO-004 Contract Management Measures and CTGL-LC-PCM-PO-001 Measures for the Implementation on Tendering and Procurement Management documents. These detail the types of contracts, procurement processes, and necessary approvals based on the contract type before executing, modifying, or altering any contract. Unauthorized contracts, including verbal agreements, are prohibited.

## 9. Gifts and Facilitation payments

CTG Latam expresses zero tolerance for gifts or bribes, which are unofficial payments made to expedite routine processes. If employees are asked to make such payments, they must actively refuse and report the incident to their department head and the legal department.

The only situation where gifts are tolerated is if the employee's health or safety is at risk.

## 10. Donations and contributions

Employees and executives are prohibited from making donations or financial contributions to political parties, movements, campaigns, or other third parties on behalf of the company, unless explicitly authorized by the executive committee and in compliance with internal policies, procedures, and Colombian law. If they make personal contributions, they must refrain from using their affiliation with the company

## 11. Compliance with laws and internal regulations

The company complies with applicable laws and regulations, as well as the rules in the countries where it operates. Additionally, CTG Latam adheres to internal control provisions, anti-money laundering, anti-terrorism financing, fraud, bribery, and corruption measures to mitigate conformity risks.

## 12. Accounting Integrity

The company ensures that all financial information reported internally or externally is accurate, complete, and reliable. Employees also participate in the Internal Control System to certify the



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accuracy of the Financial Statements for external auditors and national and international government entities.

Furthermore, the company continuously works to ensure that:

- The financial information reported is accurate, complete, and precise.
- Errors in financial information are reported immediately.
- The company's accounting records are securely and reliably backed up.

## Chapter 6 Roles and responsibilities

### 1. Executive committee

- Approve the financial, human, and technological resources required for the implementation of the Business Ethics Program.
- Approve policies for preventing bribery and other corrupt practices within the Company
- Participate in the review of compliance officer reports and managerial reports, documenting them in the appropriate minutes where necessary
- Make decisions regarding cases of bribery, corruption, or any situation that affects the company's ethical guidelines, taking the appropriate actions and procedures.

### 2. Compliance officer

- Participate in the creation and updating of Compliance and anti-bribery policies and identify risk sources.
- Provide guidance, training, receive complaints, and initiate internal investigation procedures.
- Carry out communications and training to disseminate this code.
- Present reports of policy violations and anti-corruption breaches to the Legal Representative.
- Implement the preventive measures ordered by the executive committee.
- Address any inquiries related to the code of ethics, Compliance, and anti-bribery policies, and participate in case development and execution.
- Support or coordinate the training on the policy for new members joining the company.

### 3. Department director

- Lead by example to promote a culture of transparency and integrity where bribery, corruption, and any other improper actions are deemed unacceptable.
- Participate in the management, prevention, and detection of fraud, bribery, or other risks that affect the company's transparency.
- Actively engage and motivate their team to participate in the preventive activities generated by the Business Ethics Program.
- Actively participate in investigations where their department or employee is involved.

### 4. Integrated management responsible

- Design and conduct surveys to assess employee perception of the company's ethical behaviour and that of its stakeholders (employees, customers, suppliers), when required.

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- Ensure the proper application of the program and implement necessary corrective actions to guarantee management in line with the policy principles.
- Participate in the investigation of suspicious activities.

## 5. CTG employee

- Ensure transparency in managing the tasks assigned to their role.
- Promptly report any identification of suspicious activities related to improper benefits, bribery, corruption, fraud, conflict of interest, facilitation payments, and/or extortion, among others, to the compliance officer.

## Chapter 7 Expected behavior

CTG Latam expects all its members and stakeholders to observe the following conduct:

- Always act with professionalism, good faith, loyalty, and diligence, ensuring that the tasks assigned are carried out within the framework of the laws and regulations of the countries where we operate, as well as the principles, values, and policies contained in this Code and other Corporate Governance documents.
- Respect, comply with, and adhere to legal provisions, transnational anti-corruption and anti-bribery regulations, national anti-corruption laws, and the policies and procedures outlined in the Code of Ethics.
- Promote the protection of labour rights and integrate all practices aimed at guaranteeing their respect into the Company's activities.
- Promptly report any acts or irregularities, whether by oneself or third parties, that contradict this Code or may affect the Company.
- Be prudent and respectful, acting with responsibility and discretion in interactions with others, always respecting their political, religious, sexual beliefs, and other expressed views.
- Act with the required objectivity and independence in making the decisions assigned to them.
- Make proper use of Company resources, avoiding the misuse or inappropriate use of physical assets, information, and intellectual property.
- Use the information systems and other assigned work tools appropriately, installing only authorized programs and devices by the relevant department.
- Participate in social media strictly in a personal capacity and never on behalf of the Company.
- Ensure that all transactions are duly authorized and accurately and completely recorded.
- Cooperate with internal and external auditors, as well as other regulatory and supervisory bodies, providing truthful information.

## Chapter 8 Misconduct

The following behaviours are prohibited and contrary to this Code:

- Disclosing or improperly using confidential information or any information that, while not confidential, should be known exclusively by the Company, regardless of whether such actions result in a benefit to oneself or a third party.

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- Accepting or soliciting gifts or benefits for oneself or third parties from suppliers or other stakeholders of the Company in exchange for favors, preferences, or preferential treatment that benefits oneself, family members, or anyone with whom one has a romantic relationship, including their family.
- Participating directly or indirectly in acts of embezzlement, corruption, fraud, money laundering, financing of terrorism, or any form of technological abuse, or facilitating any action or transaction that uses the Company for such purposes.
- Offering or receiving gifts or hospitality that could affect objectivity and sound judgment in decision-making in Favor of the Company.
- Submitting fictitious expense reports or claiming activities or tasks as completed when they have not been performed.
- Engaging in activities outside the Company that create a conflict of interest with the Organization, interfere with responsibilities, or pose a risk to its reputation.
- Including false information in one's resume or concealing relevant information during the hiring process.
- Sending, receiving, or providing Company information, or information regarding its directors, employees, or contractors, to third parties without the proper authorization of the responsible person and/or the Company's Legal Representative.
- Granting personal or financial benefits of any kind based on friendship or family relationships.

### **Chapter 9 Ethic code training**

The training of the Corporate Ethics Program will be carried out through:

- The employee induction process, during which the corporate code of ethics will be presented.
- An annual re-induction will be provided to all employees to reinforce their understanding of the Corporate Code of Ethics.
- Employees will be consistently encouraged to report suspicious activities.
- The approval of training will be requested from the executive committee and the relevant department director once the need for such training has been identified and understood. The training must be conducted in accordance with the company's established procedure, ensuring its effectiveness and proper documentation.

### **Chapter 10 Communication channels**

The Company has made available communication channels for employees, business associates (Clients – Suppliers – Contractors), and anyone who needs to report or inform about suspicious activities, whether directly or anonymously. These include issues such as inappropriate benefits, bribery, corruption, fraud, conflicts of interest, facilitation payments, and/or extortion. Additionally, the channels can be used to address ethical dilemmas or seek guidance on how to act properly in such situations, among others.

- Email: [compliance.officer@ctglatam.com](mailto:compliance.officer@ctglatam.com)
- Main Office: Carrera 11 -77a-49 office 601

Similarly, when a report or complaint is filed through a Request, Complaint, Claim, Suggestion, and/or Compliment system, it should be understood as a report of behaviour that violates this Program and

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is considered a breach of corporate ethics. It should not be used for suggestions or the handling of labour or personal issues.

Additionally, matters related to labour issues should only be handled through Human Resources, which will determine if the case should be referred to the Coexistence Committee. If potential conflicts of interest are involved, the case should be referred to the Compliance Officer.

### **Chapter 11 Sanctions and regulations**

Any violation of the provisions of this Code, whether actively or by omission of duties, will result in the imposition of corresponding sanctions on the person who infringes them.

In the case of employees, sanctions will be those established in the Substantive Labor Code, the Internal Labor Regulations, and applicable regulations, without prejudice to the civil or criminal liability actions that may arise.

If a supplier or contractor violates the provisions of this Code or those stipulated in their contract, a relevant investigation will be initiated, involving the appropriate control bodies and following the regular channels applicable.

### **Chapter 12 Code of Conduct For Board Directors And Senior Manager**

The company, through its executive committee, has established and approved the document CTGL-BO-PO-001 Code of Conduct for Board Directors and Senior Managers. This document, created in response to a request from the board of directors, aims to guide and standardize the duties of directors and senior managers, effectively safeguarding the company's interests and its positive image in the international market, in accordance with relevant laws and regulations.

### **Chapter 13 Supplementary provisions**

This code has been reviewed by the legal and compliance departments, commented on by the audit department, and approved by the executive committee.

The code will be reviewed by the legal department and the quality management system when modifications or updates are required and will be submitted for approval to the ECM.

This code will be communicated to company members, published in the data room, and shared with the relevant third parties.