



Sustainability Information

2015 - 2018



Contugas
Grupo Energía Bogotá

- **Board Structure**

1. Board Structure

ONE-TIER SYSTEM (with a board of directors)

	Number of members
Executive directors	5
Independent directors	2
Total board size	7

1. Board Structure

Board of Directors Regulations

This corresponds to the translation of the Board of Directors Regulations – 2018 (page 3 to 4)



ARTICLE 8.- INDEPENDENT MEMBERS:

In addition to complying with the requirements established in the applicable Law, a member of the Board of Directors shall be considered independent when he or she meets the following:

1. Must not work or have worked as an employee or officer of the Company or of the Parent Company or affiliates or subsidiaries of Grupo Energía de Bogotá. This includes anyone who have had such capacity during the last year prior to his/her appointment, except in the case of the re-election of an independent member.
2. Must not work or have worked during the last year prior to his/her appointment as an employee or officer of any shareholder who directly – or by virtue of an agreement – steers, guides or controls the majority of the voting rights or who holds the majority of the administrative, steering or control bodies.
3. Must not be a shareholder who directly – or by virtue of an agreement – steers, guides or controls the majority of the voting rights or who holds the majority of the administrative, steering or control bodies.
4. Must not be a partner, member or employee of partnerships, associations or companies that provide advisory or consulting services to the Company or to companies that belong to the same economic group to which the Company is a party of, when the income generated under such item represents twenty percent (20%) or more of its operating income.
5. Must not be an employee or officer of a foundation, association, partnership or company that receives contributions or sponsorships from the Company.
6. Must not depend solely on the income received from fees as a member of the Board of Directors of the Company.
7. Must not be an individual who receives from the issuer any remuneration other than the fees as a member of the Board of Directors, of the Audit Committee or of any other committee created by the Board of Directors.

The independence of the members of the Board of Directors shall be established through a statement issued by the candidate before the Company, its shareholders and Senior Management members, in his/her Letter of Acceptance.

The requirements set forth in this article must be met by the independent members of the Board of Directors and alternates without detriment to the obligation that each Board member has of verifying the compliance with such requirements and reporting any arising circumstance that may affect him/her to the Company.

- **Non-executive Chairman/Lead Director**

2. Non-executive Chairman/Lead Director



CONTUGAS Principal Directors:

On November 12, 2018, Through the General Shareholders Meeting, the Board of Directors was formed as follows:

**Andres Baracaldo
Sarmiento**
Chairman

**Sergio Andrés Gómez
Navarro**
Principal Director

**Jaime Alfonso Orjuela
Vélez**
Principal Director

Felipe Castilla Canales
Principal Director

**Camila Merizalde
Arico**
Principal Director

**German Barrios
Fernández Concha**
*Independent Principal
Director*

**Tulio Gonzalo
Betancourt Tobón**
Director
*Independent Principal
Director*

Role of CEO and chairman is split and chairman is non-executive but not independent

This corresponds to the
translation of the Corporate
Governance Report 2018
(page 4 to 8)

2. Non-executive Chairman/Lead Director



CONTUGAS Alternate Directors:

**Yolanda Gómez
Restrepo**
Alternate Director

**Luis Alfredo Serrato
Salazar**
Alternate Director

**Leonel Mauricio Vera
Maldonado**
Alternate Director

**Gabriel Ignacio Rojas
Londoño**
Alternate Director

**Alexandra Laurens
Florez**
Alternate Director

**Paulo Ernesto Bacci
Trespacios**
Alternate Director

Felipe Pacheco Rincón
Alternate Director

This corresponds to the
translation of the Corporate
Governance Report 2018
(page 4 to 8)

- **Gender Diversity**

3. Gender Diversity

CONTUGAS Principal Directors:

**Andres Baracaldo
Sarmiento**
Chairman

**Sergio Andrés Gómez
Navarro**
Principal Director

**Jaime Alfonso Orjuela
Vélez**
Principal Director

Felipe Castilla Canales
Principal Director

**Camila Merizalde
Arico**
Principal Director

**German Barrios
Fernández Concha**
*Independent Principal
Director*

**Tulio Gonzalo
Betancourt Tobón**
Director
*Independent Principal
Director*

This corresponds to the translation of the Corporate Governance Report 2018 (page 4 to 8)

3. Gender Diversity

CONTUGAS Alternate Directors:

Yolanda Gómez Restrepo
Alternate Director

Luis Alfredo Serrato Salazar
Alternate Director

Leonel Mauricio Vera Maldonado
Alternate Director

Gabriel Ignacio Rojas Londoño
Alternate Director

Alexandra Laurens Florez
Alternate Director

Paulo Ernesto Bacci Trespacios
Alternate Director

Felipe Pacheco Rincón
Alternate Director

This corresponds to the translation of the Corporate Governance Report 2018 (page 4 to 8)

- **Board Effectiveness**

4. Board Effectiveness

Board Meeting Attendance:

The minimum attendance for all members required is at least 57.14%.

Percentage of attendance of the Directors to the Board meetings during the exercise 2018

Directors	Percentage of Attendance (2018)
Andres Baracaldo Sarmiento	78.57%
Sergio Andrés Gómez Navarro	21.43%*
Jaime Alfonso Orjuela Vélez	71.43%
Felipe Castilla Canales	92.86%
Camila Merizalde Arico	78.57%
German Barrios Fernández Concha	92.86%
Tulio Gonzalo Betancourt Tobón	100%
Average board meeting attendance:	76.53%

This corresponds to the translation of the Corporate Governance Report 2018 (page 10 to 11)

4. Board Effectiveness



Board Performance Review:

The Regular self-assessment of board performance is through a Software, The self-assessment of the Board of Directors is carried out through the consultancy Governance Consultants hired directly by the GEB.

Board Election Process:

Board members are elected individually (as opposed to elected by slate)

- **Average Tenure**

5. Average Tenure

The average tenure from our Directors is: 2 years

Directors	Appointment Date
Andres Baracaldo Sarmiento	16/03/2018 (1 year and 5 months)
Sergio Andrés Gómez Navarro	12/11/2018 (1 year 9 months)
Jaime Alfonso Orjuela Vélez	09/08/2017 (2 years)
Felipe Castilla Canales	17/03/2016 (2 years and 5 months)
Camila Merizalde Arico	22/03/2017 (2 years and 5 months)
German Barrios Fernández Concha	11/05/2016 (3 years and 3 months)
Tulio Gonzalo Betancourt Tobón	11/05/2016 (3 years and 3 months)

This corresponds to the translation of the Corporate Governance Report 2018 (page 4 to 5)

- **Board Industry Experience**

6. Board Experience

CONTUGAS Principal Directors:

Andrés Baracaldo Sarmiento

Chairman

He is an economist from Universidad de los Andes. He holds a Master of Business Administration and a specialization in finance from London Business School. He served as Associate at European Utilities M&A and as Associate Director of the Energy and Electricity Corporate Finance Sector at the Royal Bank of Scotland. Later on, he worked as Executive Director of Investment Banking and as Director of Investment. In 2016, he joined Interconexión Eléctrica S.A., ISA as Vice President of Business Growth and Development.

Sergio Andrés Gómez Navarro

Principal Director

He is an economist from Universidad del Valle. He has a specialization in capital markets from Universidad del Rosario, and a Master of Corporate Finance from Colegio de Estudios Superiores de Administración (CESA). He served as Director of Public Credit and Director of Financial Planning at Transportadora de Gas Internacional (TGI)

This corresponds to the translation of the Corporate Governance Report 2018 (page 5 to 8)



6. Board Experience

CONTUGAS Principal Directors:

This corresponds to the translation of the Corporate Governance Report 2018 (page 5 to 8)



Jaime Alfonso Orjuela Vélez

Principal Director

He is an electrical engineer from Universidad de la Salle, with a Master of Economics from Universidad Federal do Rio de Janeiro (Japan- IDB Scholarship Program), and a specialization in public opinion and political marketing from Pontificia Universidad Javeriana. In Colombia's energy sector, he served as Planning Group Coordinator of the Energy and Mining Planning Unit (UPME, for its Spanish acronym). He also worked in the planning and regulation areas of companies such as Gas Natural Fenosa and Electrificadora del Meta, among others.

Felipe Castilla Canales

Principal Director

He is a civil engineer from Universidad de los Andes. He holds a Master of Science from the University of Illinois at Urbana- Champaign, and a specialization in finance from Escuela de Administración, Finanzas e Instituto Tecnológico (EAFIT).

His career highlights include his work as Finance Vice President of CountourGlobal Latinoamérica and as Finance Vice President of Refinería Cartagena (REFICAR).

6. Board Experience

CONTUGAS Principal Directors:

Camila Merizalde Arico

Principal Director

She is a lawyer from Universidad de La Sabana in Colombia. She has a specialization in commercial law from Pontificia Universidad Javeriana, and in financial legislation from Universidad de los Andes. She currently holds the role of Director of Corporate and Affiliate Affairs of Grupo Energía Bogotá S.A ESP. She served as Secretary of the Advisory Board of Fondo Adaptación (Adaptation Board), in which she was responsible for the calls for bids, preparation of minutes, follow-up on commitments and approval of the resolutions issued by that body. She also served as Group Coordinator of Legal Affairs for the General Directorate of Public Credit.

German Barrios Fernández Concha

Independent Principal Director

He is a lawyer from Universidad de Lima with studies at the Academy of American and International Law in Dallas, USA. He holds a Master of Corporate Law from Universidad de Lima, and a Master of International and Comparative Law from the Southern Methodist University in Dallas. He is a member of the Colegio de Abogados de Lima (Lima Bar Association), and serves as Vice President of the Legal Affairs Committee of the American Chamber of Commerce of Peru. Furthermore, he is a member of the Executive Committee of the Peruvian Hydrocarbons Society.

This corresponds to the translation of the Corporate Governance Report 2018 (page 5 to 8)



6. Board Experience

CONTUGAS Principal Directors:

Tulio Gonzalo Betancourt Tobón

Independent Principal Director

He is a civil engineer from Universidad Nacional de Colombia with specialization in management from Universidad Pontificia Bolivariana. He worked as a business advisor on natural gas procurement. He was the head of the gas transactions division at Empresas Públicas de Medellín. He has experience in the natural gas and energy business, with an emphasis on the aspects relating to regulations, tariffs and transactions associated to the purchase and sale of natural gas.

This corresponds to the translation of the Corporate Governance Report 2018 (page 5 to 8)



6. Board Experience

CONTUGAS Alternate Directors:

Yolanda Gómez Restrepo

Alternate Director

She is a lawyer from Universidad Externado de Colombia with specialization in criminal law and criminology from the same university. She brings over 20 years of public sector experience in the legal and administration areas. Among other roles, she served as Legal Defense Director at Agencia Nacional de Defensa Jurídica del Estado (Colombian National Agency for Legal Defense of the State), as Delegate Attorney for Economy and Finance of the Office of the Attorney General, and as Administration and Human Resources Vice President and Advisor to the Presidency at the Telecommunications Company of Bogotá (ETB, for its Spanish acronym). She also served as a Consultant for the World Bank, the Higher Council of the Judicature, and the Ministry of Environment, Housing and Territorial Development. In addition, she worked as Legal Manager at Empresa de Acueducto y Alcantarillado de Bogotá (Bogota Water and Sewerage Company), and as Secretary General of the Ministry of Justice and Law. She currently serves as Legal Vice President at TGI S.A. ESP.

This corresponds to the translation of the Corporate Governance Report 2018 (page 5 to 8)



6. Board Experience

CONTUGAS Alternate Directors:

Luis Alfredo Serrato Salazar

Alternate Director

He is a systems engineer from Universidad de Ibagué with specialization in technologies management from the Escuela de Administración de Negocios (EAN). He also holds a Master of Administration with a concentration in finance from Universidad de los Andes. He worked as Advisor to the Regulation Management of Transportadora de Gas Internacional (TGI). In recent years, he has served as TGI's Manager of Governance Affairs.

Leonel Mauricio Vera Maldonado

Alternate Director

He is a civil engineer from Universidad La Gran Colombia, and has a master's degree in environmental management for sustainable development from Pontificia Universidad Javeriana. He has training in project management at Universidad de los Andes, and a Project Management Professional (PMP) Certification from the Project Management Institute. Additionally, he studied strategic sourcing at Universidad de los Andes, and has a PSCM Certification (Professional in Supply Chain Management) from Centro de Comercio Internacional (International Trade Center). He has over 20 years of experience in infrastructure projects in the oil, energy, road, potable water and basic sanitation sectors.

This corresponds to the translation of the Corporate Governance Report 2018 (page 5 to 8)



6. Board Experience

CONTUGAS Alternate Directors:

Gabriel Ignacio Rojas Londoño

Alternate Director

He is an economist from Universidad de Antioquia with specialization in finance, project preparation and evaluation from the same university. She served as Investment and Affiliate Specialist at Interconexión Eléctrica S.A. ESP

Alexandra Laurens Florez

Alternate Director

She is a lawyer from Universidad Externado de Colombia with specialization in commercial law from Universidad de los Andes and a Master of Private Law from the same university. She served as Advisor to the Office of Corporate Affairs and Procurement and the General Secretariat of Grupo Energía Bogotá (GEB). Over the last few years, she has been working as Advisor to GEB's Legal, Regulatory and Compliance Presidency.

This corresponds to the translation of the Corporate Governance Report 2018 (page 5 to 8)



6. Board Experience

CONTUGAS Alternate Directors:

Paulo Ernesto Bacci Trespalacios

Alternate Director

He is a civil engineer from Universidad del Norte with specialization in project management from Universidad de Piloto de Colombia and the Institute for the Practice of Ontology. He has over 23 years of experience in the comprehensive application of knowledge, tools and techniques to meet project requirements. He has 12 years of specific experience leading the management of projects in the oil and gas sector, and holds a PMP certification from the Project Management Institute. He currently serves as TGI's Vice President of Construction.

Felipe Alejandro Pacheco Rincón

Alternate Director

He is an economist from Universidad de los Andes with specialization in financial legislation. He has a Master of Finance from Universidad de Columbia, and experience as a Financial Analyst and Associate of the Innovative Finance Division in U.S. companies. In the last few years, he has worked as Project Manager and Manager of Fondo Inmobiliario Old Mutual Comprar para Arrendar in Colombian companies.

This corresponds to the translation of the Corporate Governance Report 2018 (page 5 to 8)



- **Government Ownership**

7. Government Ownership

Composition of the shareholders:

This corresponds to the translation of the Corporate Governance Report 2018 (page 3)

Shareholders	% of Capital
Grupo Energía Bogotá S.A. ESP	68.58%
Transportadora de Gas Internacional S.A. ESP	31.42%

The Company CEO and other members of the Board of Directors do not own Contugas' shares. Given that the ownership structure is predominantly institutional, there are no family ties between the holders of significant shares. However, it should be noted that the two (2) shareholders are GEB (Grupo Energía Bogotá) enterprises .

No governmental institutions own more than 5% of the total voting rights.

GEB, belongs to the municipality of the district of Bogotá.

- **Dual Class Shares**

8. Dual Class Shares

Amount of shares per voting category:

This corresponds to the translation of the Corporate Governance Report 2018 (page 3)

Voting rights per 1 share	Votes per share	Amount of Shares	Voting Power (= Votes per share x Amount of Share)
No vote (excluding preferred and treasury shares with no voting rights)	0	0	0
One vote	1	272'863'073	272'863'073
Total		272'863'073	272'863'073

- **Materiality Disclosure**

9. Materiality Disclosure



Materiality: Sustainability Report

At Contugas, material issues are defined bearing in mind the priorities identified by the top management and the stakeholders' feedback. To prepare the materiality of 2018, we used a 3-stage analysis methodology in accordance with the principles established by the Global Reporting Initiative (GRI). Thus, ten material issues were characterized for being a constant concern for the industry and Contugas' management with respect to the situation and continuous management.

2018 Materiality Analysis Process

1. Internal analysis of CONTUGAS' strategic priorities

2. Analysis of the impact of management on Stakeholders

3. Prioritization and determination of material issues

Objective

Analysis of the environment and identification of relevant issues, opportunities, and risks

Compilation of stakeholder insights, expectations and interests

Assessment of the relevance of each issue identified

Activities

- Interview with the CEO
- 4 interviews with managers, deputy managers and coordinators
- 2 leadership workshops in Lima and Ica
- Review of strategic documents of the company and Grupo Energía Bogotá (Strategic Plan, results of internal surveys, media monitoring, corporate policies).

- Multistakeholder panel with the 6 attending organizations
- 3 workshops as a space for dialogue with the community in Chincha, Ica and Pisco
- 2 interviews with industrial customers
- 2 customer surveys in Nasca and Marcona
- Interviews with 5 State authorities: Municipalities of Chincha and Pisco, MINEM, OSINERGMIN and SERNANP
- 45 surveys to collaborators
- Interviews with 2 regional media
- Interviews with 2 suppliers and guilds (Ica Chamber of Commerce)

- Analysis and assessment of 10 relevant topics
- Elaboration of the materiality matrix
- Benchmarking of 3 energy/gas companies

This corresponds to the translation of the Sustainable Management Report – 2018 (page 24)

9. Materiality Disclosure

This corresponds to the translation of the Sustainable Management Report – 2018 (page 25)



List of material topics

Issue

Description

 ● Building of trust and client satisfaction

Agile, close and reliable relationship with industrial, business and residential clients, with the purpose of strengthen business opportunities, promote the consumption of natural gas and improve the business experience, seeking for loyalty, satisfaction and a higher per capita consumption

 ● Promotion of the growth of the natural gas market in Ica

Launching the creation of new business projects that take the natural gas as a resource, managing the ethical risks, conduct and exposure of the brand in front of the growing demand for trade negotiation spaces

 ● Dissemination of the economic, environmental and safety benefits of natural gas

Positioning of the positive impacts of natural gas in the efficiency of industrial operations, residential activities and mobility businesses, as in environmental conservation and job creation

 ● Management of risks and social impacts related to the operation

Mapping of possible social risks for the constant development of the operation, identification of actors and design of the strategy to mitigate possible negative impacts on new incursions. Management and dissemination of the company's intervention for local development and positive impacts

 ● Integral development of employees and work environment

Strengthening of human management policies in the strategic lines of professional development, employee retention, job security, good working environment and adequate infrastructure for the work.

 ● Risk and environmental impacts management derived from the operation

Early identification of possible impacts of the environment operation and preventive management for the reduction of pollutants. Immediate response to environmental emergencies

9. Materiality Disclosure

This corresponds to the translation of the Sustainable Management Report – 2018 (page 25 to 26)



● Genuine relationship with the community, clients and users



● Generation of innovative solutions based on the natural gas to create new businesses and maintain financial stability



● Relationship with the State and the regulator for compliance with regulations



● Relationship with investors



● Continuity of operations for the provision of the service



● Development of new businesses from shared energy infrastructure



● Supplier and contractor management for process planning and optimization

Real knowledge of the social and economic dynamics of the influence areas and the use and consumption of natural gas, allowing a genuine relationship with clients, community and users, through partnership and trust building

Generation of integral and innovative solutions that facilitate business growth and allow the use of business opportunities with strategic partners, ensuring the business continuity

Management of the relationship with the local State and regulatory bodies, compared with the closeness compliance with the BOOT contract

Relationship Management with the investors

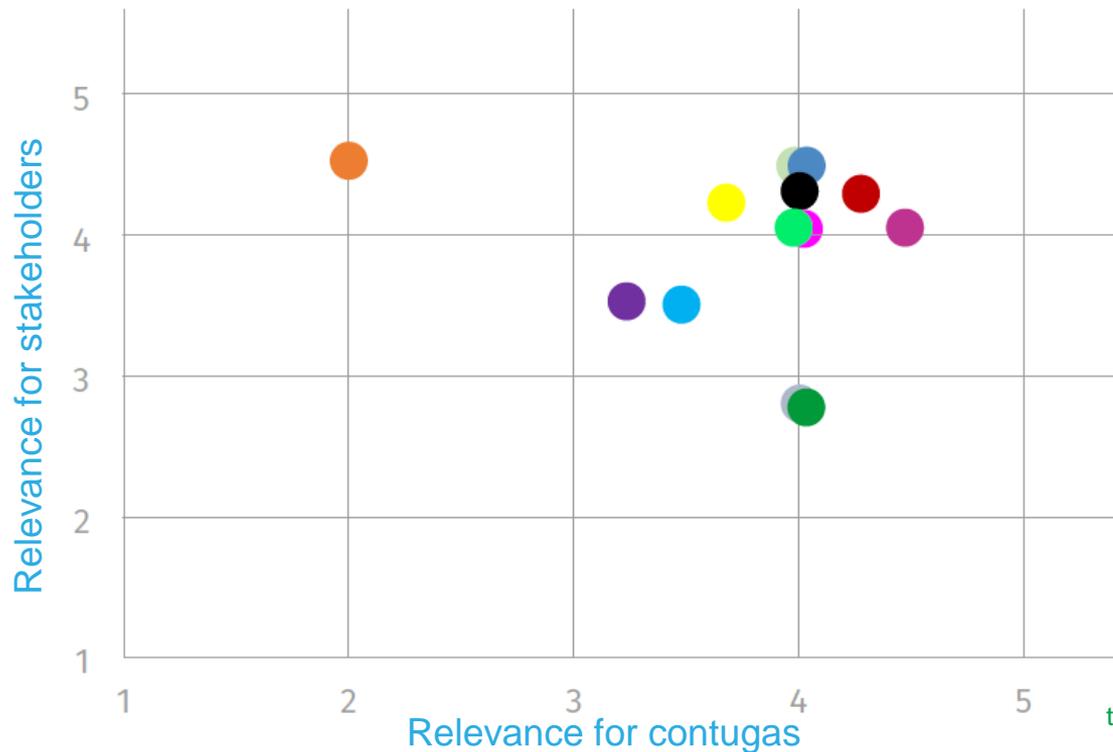
Ensuring the uninterrupted provision of the service, mitigating risks in the operation, maintaining and acting effectively in case of emergencies

Entrance in the energy cogeneration business line in partnership with strategic industrial partners

Strengthening processes within the supply chain, with emphasis on suppliers and contractors. Development of skills in local suppliers

9. Materiality Disclosure

Materiality matrix



This corresponds to the translation of the Sustainable Management Report – 2018 (page 26)

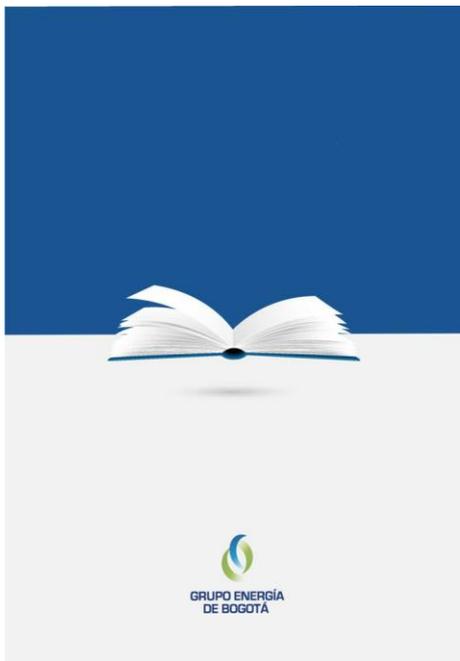
- **Codes of Conduct**

10. Codes of Conduct

This corresponds to the translation of the Code of ethics – (page 01 to 17)



Code of ethics



The Code of Ethics: a collective output

Grupo Energía de Bogotá has built its Code of Ethics based on best business practices and within the Global Corporate Responsibility Macro Policy guidelines. But most importantly, this code is the output of a participatory exercise wherein all collaborators from the different areas of the companies under Grupo Energía de Bogotá contributed comments that strengthened its essence. Afterwards, it was submitted to the Presidential Committee of Empresa de Energía de Bogotá S. A. E.S.P., the parent company of Grupo Energía de Bogotá, which approved it as a single institutional purpose.

What is a code of ethics and what is it for?

The Code of Ethics (hereinafter the “Code”) sets forth and advances the behavior guidelines and rules of conduct of Grupo Energía de Bogotá (hereinafter the “Group”) that shall be followed by its managers, collaborators, suppliers, contractors and stakeholders in their engagements and when interacting in the markets where they operate, so that their actions adhere to the corporate values and obligations undertaken in the employment relationship.

The application of the guidelines set forth in this code requires managers and collaborators to become familiar with its contents and to have a clear understanding of the definitions, concepts and instances to which they may resort to in order to raise concerns and/or situations resulting from a code violation.

The managers and collaborators of the Group's companies may face situations falling outside this Code; however, it is their responsibility and obligation to use good judgment in accordance with our corporate values and to seek guidance and support, as appropriate, from their immediate superior and/or internal auditor and/or Ethics Channel, who shall notify such situation to the Ethics Committee of each company of Grupo Energía de Bogotá, if so required.

Breaching the guidelines established in this Code shall generate disciplinary sanctions for the managers and collaborators of the Group companies as per the country's applicable legislation and the Internal Labor Regulations of each company of Grupo Energía de Bogotá. Sanctions shall also be imposed on suppliers and contractors in accordance with the provisions of their own legal regulations, Procurement Law and the Comptroller's and/or Oversight Manual in force.

10. Codes of Conduct



Who shall comply with this Code?

This Code is applicable to all the companies under Grupo Energía de Bogotá and is binding upon all its managers and collaborators, who shall adhere to it by signing the Adhesion Agreement to the Code of Ethics.

By signing the employment contract with one of the companies of Grupo Energía de Bogotá, collaborators adhere to the Code, which is updated annually in coordination with human resources management, or whoever is acting as such. In the case of members of the board of directors, who sit on the administration, they sign the adhesion agreement when accepting their appointment by the general assembly of shareholders and it is updated annually in coordination with the general secretary, or whoever is acting as such.

Suppliers and contractors when performing their duties as per contracts, agreements, purchase orders, service orders or other similar mechanisms shall act in accordance with this Code. This is made explicit in the clauses of such contracts, service orders or similar documents.

Our corporate values

The actions of managers and collaborators in their engagements with stakeholders and in the fulfillment of the responsibilities assigned to them shall be in accordance with the corporate values that guide the ethical culture of Grupo Energía de Bogotá, which are:

- Transparency: we manage in an objective, clear, and verifiable manner.
- Respect: we engage recognizing collective interests, individual diversity, sustainability of natural resources, and institutionalism.
- Integrity: we act with resolve, righteousness, honesty, and coherence.
- Equity: we proceed with justice, equality and impartiality, seeking a positive and inclusive social impact.

This corresponds to the translation of the Code of ethics – (page 01 to 17)

10. Codes of Conduct

This corresponds to the translation of the Code of ethics – (page 01 to 17)



How do we act with our stakeholders?

With our collaborators

The Grupo Energía de Bogotá promotes a working atmosphere based on respect, trust and teamwork. We also foster a safe and healthy environment for our collaborators by avoiding – as much as possible – adverse impacts, damage or deterioration of their physical integrity or that of the surrounding environment, and of the communities standing in the regions where we operate.

Grupo Energía de Bogotá ensures that decisions taken regarding its collaborators are based on fairness, merit, performance and other objective factors related to the responsibilities of their position.

The Group's managers and collaborators shall not discriminate against any person on the basis of sex, race, nationality or family origin, language, religion, or political or philosophical opinion. The Group also promotes a balance between work responsibilities and personal and family life.

Managers and collaborators shall not use their badge or the Group companies' attire to gain a benefit outside the Group or for a purpose other than to identify themselves as a collaborator of one of the Group companies.

With our suppliers and contractors

The Group encourages suppliers and contractors to know and share our corporate values. In this regard, the Group demands that they and their supply chain behave in line with the provisions set forth in this Code and other applicable standards and policies on transparency, honesty, information security, industrial security, environmental security and quality, namely. At the same time, the Group seeks cooperation to fulfill the Group's commitments with its areas of interest and society.

With our customers

Our relationship is based on mutual respect, impartiality and trust, keeping in mind the acknowledgment of their rights and needs.

The Group maintains transparent relationships with its customers for which, if required, information is provided in a timely, accurate, complete and understandable manner, provided that such information comes from business relationships within a legal framework and there are no prior confidentiality agreements with third parties

10. Codes of Conduct



With our shareholders

The companies of the Group ensure that, in their relationship with its shareholders, no shareholder is privileged to the detriment of another.

With the markets

The Group promotes integrity and transparency in the markets in which we participate and is committed to ensuring that our managers and collaborators comply with the applicable regulatory provisions.

The managers and collaborators refrain from carrying out activities such as changing the price of goods or services, disseminating false or misleading information, or modifying the value of goods and services assigned by the market with the purpose of intentionally influencing, whether directly or indirectly, investment, purchase, sale or negotiation decisions with a third party.

With society

The Group acts in a respectful manner and with an attitude of dialogue with society, especially with the communities located around its infrastructure with the purpose of achieving common interests, presenting corporate standpoints and preventing possible conflict and risk situations.

The Group carries out its business activities without interfering with, conditioning, restricting or influencing the political orientation of its managers, collaborators or stakeholders. The relationship with society's political actors is carried out within the framework of the corporate values mentioned in this Code. The Group's companies adhering to the United Nations Global Compact undertake to implement in their strategies and operations the ten principles in the areas of human rights, labor, environment and anti-corruption.

With the Government

The Group complies with all laws, rules and regulations in force in the countries where we have presence, respecting the instances of the country's legal system.

Managers and collaborators of the companies of the Group who, by reason of their duties, maintain a relationship with the Government and other governmental bodies shall carry themselves with professionalism and seriousness, always trying to keep an objective attitude with regards to matters of the Group companies.

This corresponds to the translation of the Code of ethics – (page 01 to 17)

10. Codes of Conduct

This corresponds to the translation of the Code of ethics – (page 01 to 17)



With surveillance, inspection and control bodies

In its relationship with surveillance, inspection and control authorities and bodies, the Group maintains one based on cooperation and transparency, always seeking to follow-through timely and diligently.

With the competition

When operating in a market, the managers and collaborators of the Group are respectful and transparent towards their competitors and refrain from carrying out actions that threaten free and fair competition.

The companies of the Group only accept contracts awarded in transparent processes and refrains from offering or giving compensation contrary to sound business practices, either in cash or in kind, and does not give in to pressure in exchange for such awards.

Information about competing companies shall be obtained through legitimate means and used exclusively for legitimate purposes, as authorized by the law, and shall be kept with the loyalty and respect imposed by good business and commercial practices.

When does a conflict of interest arise?

The Group's managers and collaborators will find themselves in a situation of conflict of interest when, in the development of their responsibilities, their integrity and judgment may be influenced by the possibility of choosing between the interests of the company, their own interests or those of a third party. Below are some examples of conflicts of interest.

Direct or indirect employment relationship

Managers and collaborators, their spouse, partner or permanent companion, and relatives up to the second degree of consanguinity, the second degree of affinity or the first degree of civil relationship shall not seek a benefit for themselves or a third party by means of providing confidential information or by using a position of influence in the companies of the Group.

Managers have the duty to inform the Board of Directors about any direct or indirect relationship they have between them, with the company, related parties, shareholders, suppliers, contractors or any other stakeholder from which situations of conflict of interest may arise or influence the direction of their opinion or vote.

10. Codes of Conduct



It is understood that there is a conflict of interest on the side of the managers and collaborators in the development of their duties when their spouse, partner or permanent companion and relatives up to the second degree of consanguinity, the second degree of affinity or the first degree of civil relationship are found in one, or more, of the following situations:

- Is in a superior to subordinate relationship.
- If he or she belongs to an internal audit department, regarding another collaborator of any area to be audited.

Gifts and entertainment

Managers and collaborators shall not give or receive gifts and entertainment related to customers, suppliers and contractors, except for merchandizing items intended for brand positioning and brand awareness.

Managers and collaborators may attend events and celebrations sponsored by suppliers and contractors, subject to the prior approval of the corresponding authorities, provided that the companies of the Group cover their travel expenses, if required.

Should the manager or collaborator have doubts at the moment of giving or accepting a gift and/or entertainment, the director of internal audit, or whomever is acting as such, shall be consulted.

Participation in transactions of Grupo Energía de Bogotá

Managers and collaborators cannot have a significant participation in a property, asset or investment that the company is acquiring or is going to acquire, directly or indirectly.

In the case of their spouse, partner or permanent companion and relatives up to the second degree of consanguinity, the second degree of affinity or the first degree of civil relationship, they must report such acquisitions to the immediate superior and/or director of internal audit or whomever is acting as such.

This corresponds to the translation of the Code of ethics – (page 01 to 17)

10. Codes of Conduct

This corresponds to the translation of the Code of ethics – (page 01 to 17)



Procurement processes

Managers and collaborators shall not participate in procurement processes or negotiations when they or their spouse, partner or permanent companion and relatives up to the second degree of consanguinity, the second degree of affinity or the first degree of civil relationship are involved in a conflict of interest.

If there is a conflict with the hiring processes, they shall timely and expressly declare this to their immediate superior and/or internal auditor or whomever is acting as such.

Managers and collaborators cannot be comptrollers or supervisors when they have a conflict of interest with respect to the contractor or supplier. This is also applicable to contractors acting as supervisors or comptrollers.

Who to report a conflict of interest to?

Situations involving a conflict of interest may not always be obvious or easy to resolve. For this reason, managers and collaborators should report situations involving a conflict of interest as soon as they are perceived and before making any decision to the immediate supervisor, the internal auditor or whomever is acting as such, or through the Ethics Channel, who will notify the situation to the Ethics Committee.

Conflicts of interest involving the internal auditor or members of the Ethics Committee shall be reported directly to the company's Audit Committee. If the company of the Group does not have an audit committee, then the corporate Ethics Committee shall be informed.

Managers, collaborators, suppliers, contractors and other stakeholders may also report a conflict of interest through the Ethics Channel, following the procedure established for this purpose.

Notwithstanding the foregoing, managers and collaborators shall annually report and sign a declaration of no conflict of interest related to the provisions of this Code.

How is the Company's information managed?

All the information generated throughout the management of Grupo Energía de Bogotá business is considered a valuable asset, which is why its protection is of vital importance for the development of its operations, growth and competitiveness.

The information must be kept in strict confidentiality, except when its disclosure is duly authorized by the managers of the Group's companies or is required by a legal requirement.

10. Codes of Conduct

All managers and collaborators must protect the information considered as confidential and/or privileged by Grupo Energía de Bogotá, particularly in negotiation or contractual processes, commercial relations, tenders and stock market operations, among others.

The Group complies with the rules and laws of intellectual property, protection of personal data and the terms and conditions of licenses obtained for the operation of their businesses.

Administrators, collaborators, suppliers and contractors must comply with the guidelines on intellectual property protection and information security, referring to the access, use and adequate preservation of information and technological resources.

What are the considerations in the face of fraud?

The Group is committed to promoting a culture against fraud and corruption through its zero-tolerance fraud and corruption policy and maintaining the highest level of professional and ethical standards in the way we operate and do business.

Managers and collaborators shall know and understand the Anti-fraud and Anti-corruption Policy which sets out the structural, operational and maintenance elements of fraud and corruption prevention, detection, investigation and remediation.

As managers and collaborators of the Group's companies, they are responsible for developing and complying with the procedures aimed at preventing the risk of their resources and services being used for purposes other than those assigned to them, especially those related to money laundering, financing of terrorism and the commission of any other crime.

What is the process for consultations, fraud reports and ethical dilemmas?

In the daily work, situations can arise that directly affect managers and collaborators and generate doubts about how to act. For this purpose, it is possible to seek advice in the first instance from the immediate superior. Likewise, they may consult or denounce acts of fraud and corruption as well as situations related to ethics and transparency directly through the Ethics Channel following the established procedure (consult the Ethics Channel Manual), which is administered by a third party to guarantee independence.

Claims may be reported through the following means: e-mail, the website of each company and a toll-free telephone line. All these mechanisms are part of the Ethics Channel.

This corresponds to the translation of the Code of ethics – (page 01 to 17)

10. Codes of Conduct



All queries, claims or ethical dilemmas received are treated under strict parameters of confidentiality, objectivity, respect and do not generate retaliation.

How is this Code administrated and monitored?

The Ethics Committee is responsible for monitoring and overseeing the compliance with this Code. Likewise, through the Internal Auditor or whomever is acting as such, all queries and requests raised about the application of this Code shall be attended to.

When becoming aware of any possible conduct that may violate the provisions of this Code, the Ethics Committee may decide to investigate as it is set forth in the procedure established for that purpose (Ethics Channel Manual).

Managers and collaborators who fail to comply with the provisions of this Code shall be punished in accordance with the provisions of the Internal Labor Regulations, the rules in force in the companies of the Group and the country's applicable law.

What is the commitment of the Group's managers and collaborators to this Code?

Managers and collaborators shall always work with the perspective of complying with the standards set forth in the Code of Ethics and ensuring that it is known and complied with.

How long has the Code been in force?

This Code of Ethics was approved at the meeting of the Presidential Committee of Empresa de Energía de Bogotá S.A. E.S.P., the parent company of Grupo Energía de Bogotá, held on May 20, 2013, as stated in Minute No. 22, and from that moment on it enters into force and replaces any version prior to it.

The Code of Ethics of Grupo Energía de Bogotá will be reviewed and updated regularly, when appropriate, prior evaluation and approval by the Presidential Committee.

This corresponds to the translation of the Code of ethics – (page 01 to 17)

10. Codes of Conduct



Sample of Adherence to the Code of Ethics and Declaration of No Conflict of Interest

I, _____ identified with _____ identification document No. _____, in my capacity as manager and/or collaborator of (name of Group company) _____, declare that I have received, read and understood the Code of Ethics, that I share the values and behavior guidelines contained therein and, consequently, I undertake to comply with, disclose and enforce them. I further declare that I do not have a conflict of interest (I declare that I have a conflict of interest on the following:___).

I am aware that any non-compliance with the Code of Ethics shall constitute grounds for a punishment in accordance with the provisions of the Internal Labor Regulations, other rules in force in the Company and the Law applicable in each country.

IN WITNESS WHEREOF, I sign on _____, in the city of _____.

This corresponds to the translation of the Code of ethics – (page 01 to 17)

10. Codes of Conduct

Definitions

Group: cluster of companies that all depend on the same parent company, because the latter has sufficient economic participation in their capital to make decisions. Grupo Energía de Bogotá Foundation is included within the Grupo Energía de Bogotá for the purposes of this Code.

Information: company's resource and intangible asset that allows senior management to make the right decisions. Likewise, the knowledge of the company that each collaborator acquires by virtue of their duties.

Privileged information: information that is reserved, that has not been made known to the public, and of a specific nature that has not been made known to the public and that, if it had been otherwise, it would have been taken into account by a moderately diligent and prudent investor when negotiating the respective securities.

Relevant information: information that may refer to decisions taken by the issuer's management bodies that may induce the shareholder to make investment or divestment decisions in said issuer.

Licenses or authorizations of use: authorization or permission granted by the owner of an application (software), a literary work, piece of music, etc., so that companies can develop certain activities.

Supplier: individual or legal entity capable of providing a service or good of potential interest to companies.

Information security: preservation of confidentiality, integrity and availability of information.

This corresponds to the translation
of the Code of ethics
– (page 01 to 17)

- **Client Satisfaction Measurement**

11. Client Satisfaction Measurement



Our results are the following:

Customer Satisfaction	2015	2016	2017	2018
Satisfied customers	82.8 %	85.9 %	84.9 %	84.0 %
Data coverage: % of customers surveyed (both respondents and non-respondents) out of total number of customers	3.59 %	3.36 %	2.83 %	2.45%

11. Client Satisfaction Measurement



Customer experience and satisfaction

In our commitment to delivering the best service to all of our customer segments, we constantly assess the quality of our services. Therefore, we have identified our strengths and areas for improvements by means of an annual customer satisfaction survey focused on the following critical processes that touch upon our relationship:

- Invoicing
- Sales and internal installations
- Emergency response
- Construction of networks on public roads
- Customer care through the Customer support center
- Customer care through the Call Center

This corresponds to
the translation of the
Sustainable
Management Report
– 2018 (page 41)

At the end of 2018, the Customer Satisfaction Index (CSI) reached 85.6%, surpassing the target of 84.9%. All of this has been possible thanks to the implementation of the “100% passionate about our customers” project. It allowed us to identify areas for improvement and develop action plans based on 2017’s results to enhance the experience of all customers.

We are 100% passionate about our customers 2018’s most important program to achieve best customer experience. This project aims to turn satisfied customers into loyal customers by identifying areas for improvement. The information collected from these activities served as an input for two co-creation workshops held with representatives of the areas involved who worked on improvement proposals. One of the improvements identified as part of this project was to change the way we answer to a group of complaints. Now, instead of responding by courier, we are replying by e-mail. In December 2018, we carried out a pilot that showed savings of S/10 per delivery. Another improvement proposal implemented was the production of flyers and videos about bills to foster a better understanding of the billing process. As a result, claims fell from 3% to 2%, from 2017 to 2018.

- **Contributions and Other Spending**

12. Contributions and Other Spending



	2017	2018
Trade associations or tax-exempt groups (e.g. think tanks)	21 274	36 188
Data coverage (as % of denominator)	100 %	100 %

USD - US Dollar

- **Largest Contributions and Expenditures**

13. Largest Contributions and Expenditures



Our results are the following:

Name of organization	Type of Organization	2018
National Mining, Oil and Energy SocietySNMPE - Afiliaciones	Trade association - Afiliaciones	34 353
Ica Chamber of Commerce - Afiliaciones	Trade association - Afiliaciones	1 094
Chinchana Chamber of Commerce - Afiliaciones	Trade association - Afiliaciones	741

- **Awareness**

14. Awareness

This corresponds to the translation of the Sustainable Management Report – 2018 (page 68)



b. Sustainable supply chain

Goal 8: Decent Work and Economic Growth

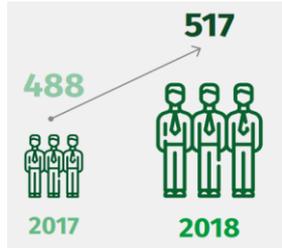
Contugas believes that the correct management of a supply chain generates value for the operations because it strengthens competitiveness and enhances service quality.

Contugas' supply chain follows the corporate policies guidelines drawn up by Grupo Energía Bogotá to ensure that goods and services are procured in compliance with the principles established in the Procurement Manual, Management and Comptrollership Manual and within the framework of the Sustainability Model. In addition, we have an Anti-Fraud and Anti-Corruption Policy, in accordance with our Code of Ethics, that applies to stakeholders.

ISO 9001 quality standard requirements are followed in the management of our supply chain to keep user areas satisfied with the acquisition of their requested products. Furthermore, the BOOT contract signed by and between Contugas and the State sets forth that all materials must be purchased from suppliers with certified quality control systems to ensure the guarantees commonly provided by the industry.

The company also has an internal control system in place for both documents and all materials to complete the supply chain.

Key figures for suppliers



During 2018, Contugas had 517 suppliers, a figure higher than the 488 suppliers working with the company in 2017. This year, 161 new suppliers joined Contugas, which have been evaluated and selected according to environmental criteria.

Supply process



Having suppliers that comply with legal and regulatory requirements is a priority for Contugas as it ensures that goods and services are acquired in optimal conditions. For this reason, we work meticulously in the identification, evaluation and registration of suppliers.

- **Transparency & Reporting**

15. Transparency & Reporting

Supply process

This corresponds to the translation of the Sustainable Management Report – 2018 (page 69)



1 Identification of needs:

We identify which goods or services are needed to carry out an operation and then schedule their delivery date.

2 Identification of suppliers:

Providers furnishing goods or services are identified and invited to register as such, provided that they are not already in our roster.

3 Supplier registration and assessment:

We check the supplier's credit score kept by credit reference agencies, and if they are in a blacklist due to asset laundering and financing of terrorism, and their taxpayer activity as per SUNAT.

In addition to being critical with regard to the good or service, we request and evaluate the financial, technical, legal, quality, occupational health, and safety information is re, among others.

4 Call for bids and selection of suppliers:

Eligible suppliers are invited to submit their goods or services quotations. The quotations are assessed bearing in mind the allocated budget. Depending on the quotation price, an evaluation committee may perform the evaluation.

15. Transparency & Reporting



2018 achievements

We are proud of our 2018 achievements on sustainable sourcing management:



Increased internal customer satisfaction to 94%, 4 points higher than that of 2017

Preparation of the Annual Procurement Plan to facilitate the planning of purchases and management of contracts.

Total savings amounting to 13% (14% taking into account market prices and 11% considering historical/trading prices)

Implementation of electronic auctions.

This corresponds to the translation of the Sustainable Management Report – 2018 (page 70)

15. Transparency & Reporting

Contributing to the development of our suppliers

This corresponds to the translation of the Sustainable Management Report – 2018 (page 71)



Contribuyendo al desarrollo de proveedores

Durante el año, se programaron y ejecutaron capacitaciones trimestrales a los interventores de contratos con el objetivo de asegurar el cumplimiento del Manual de Contratación y Manual de Gerencia e Interventoría. Asimismo, se celebró el segundo encuentro con Proveedores, organizado por Calidda, en donde participaron 35 proveedores de Contugas y se trataron temas relevantes de la gestión de abastecimiento en la empresa, proyectos futuros así como temas éticos.

Se continuó con la participación en ferias con el fin de identificar nuevos proveedores para ampliar la cantidad de postores en los diferentes procesos de contratación. También, se implementó la plataforma OnBase que permite gestionar todo el contenido contractual en una ubicación segura, obteniendo mejoras a nivel de productividad, minimización de riesgos y generando trazabilidad en la gestión.

Se siguió reconociendo el esfuerzo de los proveedores por optimizar sus procesos y mantener altos estándares que contribuyen a la seguridad en Contugas, el respeto al medio ambiente y al entorno; en este sentido, se premió a dos proveedores por sus buenas prácticas en las categorías de Seguridad y Salud en el Trabajo, Medio Ambiente y Sostenibilidad.



2018
35
proveedores
participaron en el
segundo encuentro,
organizado por Calidda.

Premiación a proveedores

En la categoría de sostenibilidad se premió a la empresa Nutriedúcate por las capacitaciones realizadas para sensibilizar a la ciudadanía a través de proyectos sociales relacionados a la educación alimentaria, especialmente en la erradicación de la malnutrición.



Por otro lado, la empresa Ingeniería Servicios y Soluciones Aplicadas (ISSA PERÚ S.A.C) fue premiada en la categoría de Seguridad y Salud en el Trabajo/ Medio ambiente por los esfuerzos desplegados en capacitar y entrenar a sus colaboradores en seguridad y salud en el trabajo así como en prevención, respuestas ante emergencias y medio ambiente.

During the year, contract comptrollers attended and completed quarterly training courses to ensure compliance with the Procurement Manual and the Management and Comptrollership Manual. Moreover, 35 Contugas suppliers participated in the Second Suppliers' Meeting organized by Calidda. The meeting covered topics related to the company's supply management, future projects, as well as ethical issues.

We continue to be present in fairs to identify new suppliers and increase the number of bidders for our different tenders. Also, we implemented *OnBase*. This is a platform used to securely manage all contracts thus enhancing our productivity, minimizing risks, and adding traceability to the management system.

In Contugas, we recognize our suppliers' efforts to optimize their processes and maintain high standards. All of this contributes to our safety, and respect for the environment and the workplace. For example, two suppliers received awards for their good practices in the categories of Safety and Health in the Workplace and Environment and Sustainability. 2018

35 suppliers participated in the second meeting organized by Calidda Supplier Awards

In the sustainability category, the company Nutriedúcate was awarded for the training provided to raise public awareness through social projects related to food education, especially in the eradication of malnutrition.

On the other hand, Ingeniería Servicios y Soluciones Aplicadas (ISSA PERÚ S.A.C) received the Safety and Health at Workplace/Environment award for its efforts in training and building the skills of its collaborators on safety and health at the workplace, as well as on prevention, emergency response, and environment.

15. Transparency & Reporting



Supplier Evaluation (308-1) (308-2) 2018

Matriz de identificación de aspectos ambientales		Planes de contingencias		Procedimientos de identificación de aspectos e impactos ambientales		Cumplimiento normativo: Ley General del Ambiente (Ley N° 26811), Ley General de Residuos Sólidos (Ley N° 22734) y Reglamento para la Protección Ambiental en las Actividades de Hidrocarburos (D.S N° 003-2013-VIVIENDA)	
<p>Adicionalmente a las evaluaciones ambientales y sociales, Contugas realiza una evaluación de manera periódica utilizando los siguientes procesos:</p> 	<p>Proceso a aplicar</p>	Análisis de riesgo del proveedor	Registro del proveedor en plataforma web	Evaluación de bienes críticos	Inspección al proveedor (opcional)	Revisión en listas restrictivas	Actualización de base de datos de proveedores
		<p>Aspectos por evaluar</p>	SUNAT (o ficha RUC, central de riesgo)	Información general, información bancaria, vigencia de poderes, información tributaria, certificaciones, experiencia, información financiera, información HSE, estructura organizacional, socios de la empresa, otros	Cumplimiento de especificaciones	Verificación de las condiciones particulares definidas en cada proceso en coordinación con áreas involucradas	SARLAFT (Sistema de Administración del Riesgo de Lavado de Activos y de la Financiación del Terrorismo)

171 new suppliers passed evaluation and selection filters

In 2018, Contugas hired 171 new suppliers who passed all evaluation and selection filters according to environmental and social criteria. As well, the potential environmental impacts of 517 company suppliers were assessed. In both cases, we identified that their activities did not generate any negative impacts. Therefore, improvement plans were not considered.

This corresponds to the translation of the Sustainable Management Report – 2018 (page 72 to 73)

15. Transparency & Reporting



(Page 72 y 73) Supplier Evaluation (308-1) (308-2) 2018

This corresponds to the translation of the Sustainable Management Report – 2018 (page 72 to 73)

On the other hand, to ensure that all suppliers meet the company's standards, a commitment clause is included in 100% of the general conditions outlined in the processes for hiring suppliers. Thus, suppliers abide to meet the statutory environmental obligations and those of the company, therefore fulfilling Contugas standards. The timely management of Contugas' supply chain has prevented the occurrence of incidents and the cancellation of contracts.

According to the nature of each contract, the environmental division defines those aspects to be evaluated. These are:

Environmental aspects identification matrix	Contingency plans	Procedures to identify environmental aspects and impacts	Regulatory Compliance: General Environmental Law (Act 28611), General Law on Solid Waste (Act 27314) and Regulations for Environmental Protection in Hydrocarbon Activities (S.D. No. 003-2013-VIVIENDA)
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15. Transparency & Reporting

(Page 72 y 73) Supplier Evaluation (308-1) (308-2) 2018

This corresponds to the translation of the Sustainable Management Report – 2018 (page 72 to 73)



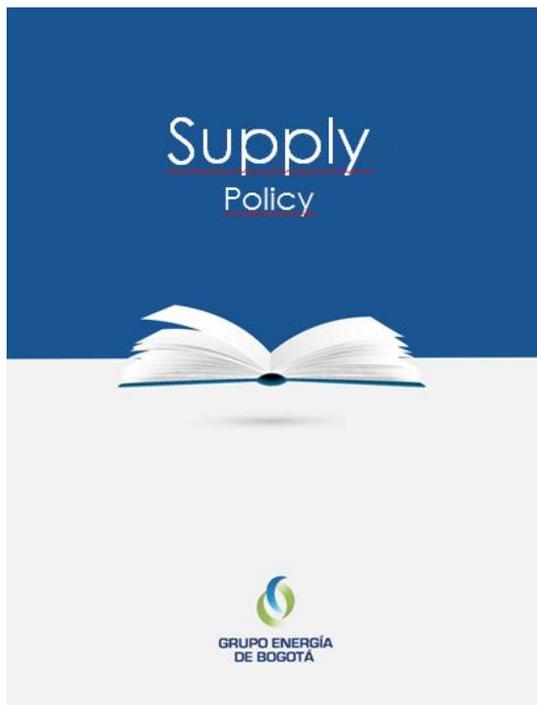
In addition to the environmental and social evaluations, Contugas performs periodic evaluations that use the following processes:

Process to be applied	Supplier risk analysis	Supplier's registration in website	Assessment of critical goods	Supplier inspection (optional)	Verification on restrictive checklists	Updating the Supplier's Database
Aspects to assess	SUNAT (RUC datasheet or credit reference agency)	General information, banking information, validity of powers of attorney, tax information, certifications, experience, financial information, HSE information, organizational flowchart, partners of the company, others.	Compliance with specifications	Verification of the particular conditions defined in each process in coordination with the divisions involved	SARLAFT (Asset Laundering and Terrorist Financing Risk Management System)	General data, SUNAT

15. Transparency & Reporting



Supply Policy



INTRODUCTION

This Supply Policy applicable to the companies of Grupo Energía de Bogotá (hereinafter “Group”) sets forth the action framework that will govern the procurement of goods and services by the companies of the Group in compliance with the principles contained in the Procurement Manual, and always within the framework of the corporate sustainability model. All of this aims to promote best practices in the management of competitiveness, quality, the compliance with occupational, environmental, and social health, safety and security standards along the supply chain, as well as the due diligence of human rights by both suppliers and contractors who are essential to the business. Furthermore, this is to promote efficient and sustainable procurement processes based on cost, risk, impact, and market opportunity.

COMMITMENT STATEMENT

The companies of Grupo Energía de Bogotá undertake to apply this policy by adopting world-class practices in their own procurement processes with the purpose of contributing to the fulfillment of the corporate strategy and the promotion of business growth within the framework of the corporate sustainability model.

1. Achieve effectiveness in our supply processes as of its planning phase based on a Supply Position Matrix that covers cost, risk, impact, and market opportunities.
2. Classify purchases and contracts in categories according to their due technical specification.
3. Develop market intelligence to identify the structure, characteristics and trends of the goods and/or services market.
4. Generate alliances with strategic suppliers always looking for the best business for the companies of the Group.
5. Evaluate the supplier’s performance to ensure they comply with the obligations initially agreed upon.

This corresponds to the translation of the Supply Policy – (page 01 to 03)

15. Transparency & Reporting



6. Acquire relevant goods and services of good quality and fair costs that contribute to the achievement of the company's strategic objectives.
7. Ensure that our suppliers meet the requirements of our global responsibility, social, environmental and anti-fraud and anti-corruption policies.
8. Generate standards, tools and procedures to implement the strategic sourcing model.
9. Establish transparent processes for the procurement and supply of goods and/or services in accordance with the policies and statutes in force.
10. Ensure that, along the supply chain, internationally accepted standards regarding quality, occupational health and safety, environmental management, energy efficiency, information security, and business continuity are followed.
11. Specialization of the procurement and contracting units' work within the companies of the Group.

AREA RESPONSIBLE FOR THIS POLICY

The top management, collaborators, suppliers and contractors of the Companies of the Grupo Energía de Bogotá are responsible for the adoption of this Policy.

This corresponds to the translation of the Supply Policy
– (page 01 to 03)

- **Privacy policy: Systems/Procedures**

16. Privacy policy: Systems/Procedures

Personal Data Protection Policy

1. OBJECTIVE

Makes known the requirements of the Personal Data Protection Law (Law N° 29733) and its Regulation to all the collaborators of CONTUGAS S.A.C, hereinafter referred to as CONTUGAS, as well as guarantee their compliance.

2. SCOPE

All those processes of CONTUGAS that involve information of personal data of the Data Banks of collaborators, clients, suppliers, applicants and third parties.

3. DEFINITIONS

3.1. Authorization: Prior and informed consent of the holder to carry out the processing of personal data.

3.2. Privacy Notice: Oral or written communication generated by the person in charge, addressed to the holder for the processing of their personal data.

3.3. Personal data bank: Organized set of personal data, automated or not, and for a specific purpose, whatever the form of its creation, training, storage, organization and access; being able of maintain the same personal data to more than one personal data bank.

3.4. Non-automated personal data bank: Data set of natural persons not computerized and structured according to specific criteria, which allows access to personal data without disproportionate efforts, be it centralized, decentralized or distributed in a functional or geographical way.

3.5. Block: It is the measure by which the person in charge of the personal data bank prevents third-party access to the data and these can not be processed during the period in which any request for updating, inclusion, rectification or deletion is being processed.

3.6. Cancellation: It is the action or measure that the Law described as elimination, when it refers to personal data, which consists in deleting or eliminate the personal data of a data bank.

This corresponds to the translation of the Personal Data Protection Policy – (page 01 to 06)



16. Privacy policy: Systems/Procedures

- 3.7. Personal data: All that numerical, alphabetical, graphic, photographic, acoustic or any other information relating to natural persons that identifies or makes them identifiable.
- 3.8. Personal data related to health: That information relating to past, present or predicted, physical or mental health of a person, including the degree of disability and their genetic information.
- 3.9. Public data: It is the data that is not semi-private, private or sensitive, usually found in public records.
- 3.10. Data necessary: Personal data of the holders that are necessary to carry out the affiliation to life insurance, these must be provided by the holder.
- 3.11. Optional data: Data that CONTUGAS requires to offer additional services.
- 3.12. Sensitive data: Personal data referred to a person's racial or ethnic origin, economic income, data relate to health, opinions or political, religious, philosophical or moral beliefs, union membership, and information related to health or sexual life.
- 3.13. ARCO Rights: Rights of the holder of the Data.
 - Access: Everyone has the right to obtain information about themselves, which is being processed in a public or private administration data bank.
 - Rectification: It is the right of the holder of personal data to modify the data that are partially or totally inaccurate, incomplete, erroneous or false.
 - Cancellation: The holder of the personal data can request the deletion or cancellation of their personal data from a personal data bank when these are no longer necessary or relevant for the purpose for which these were collected.
 - Opposition: Everyone has the possibility of opposing, for a legitimate and well-founded reason, referred to a specific personal situation, to appear in a data bank or to the processing of their personal data.
- 3.14. Responsible for the processing: Natural or Legal Person, public or private that by himself or in association with others performs the Processing of personal data on behalf of the Data Responsible.
- 3.15. Cross-border flow of personal data: International transfer of personal data to a recipient located in a different country of the origin country of the personal data, without regard of the support in which they are, the means by which the transfer was made or the processing they receive.



16. Privacy policy: Systems/Procedures

- 3.7. Personal data: All that numerical, alphabetical, graphic, photographic, acoustic or any other information relating to natural persons that identifies or makes them identifiable.
- 3.8. Personal data related to health: That information relating to past, present or predicted, physical or mental health of a person, including the degree of disability and their genetic information.
- 3.9. Public data: It is the data that is not semi-private, private or sensitive, usually found in public records.
- 3.10. Data necessary: Personal data of the holders that are necessary to carry out the affiliation to life insurance, these must be provided by the holder.
- 3.11. Optional data: Data that CONTUGAS requires to offer additional services.
- 3.12. Sensitive data: Personal data referred to a person's racial or ethnic origin, economic income, data relate to health, opinions or political, religious, philosophical or moral beliefs, union membership, and information related to health or sexual life.
- 3.13. ARCO Rights: Rights of the holder of the Data.
- Access: Everyone has the right to obtain information about themselves, which is being processed in a public or private administration data bank.
 - Rectification: It is the right of the holder of personal data to modify the data that are partially or totally inaccurate, incomplete, erroneous or false.
 - Cancellation: The holder of the personal data can request the deletion or cancellation of their personal data from a personal data bank when these are no longer necessary or relevant for the purpose for which these were collected.
 - Opposition: Everyone has the possibility of opposing, for a legitimate and well-founded reason, referred to a specific personal situation, to appear in a data bank or to the processing of their personal data.
- 3.14. Responsible for the processing: Natural or Legal Person, public or private that by himself or in association with others performs the Processing of personal data on behalf of the Data Responsible.
- 3.15. Cross-border flow of personal data: International transfer of personal data to a recipient located in a different country of the origin country of the personal data, without regard of the support in which they are, the means by which the transfer was made or the processing they receive.

16. Privacy policy: Systems/Procedures



3.16. Guiding Principles: Principles that must govern the use of personal data:

- Consent: The processing of personal data is legal when the holder of the personal data has given his free, prior, express, informed and unequivocal consent.
- Purpose: A purpose is determined when it has been expressed clearly, without any confusion and when objectively the object that will have the processing of personal data is specified.
- Quality: The data contained in a personal data bank must be precisely adjusted to reality. It is assumed that the data directly provided by the holder are accurate.
- Security: The processing of personal data must take the necessary security measures in order to prevent any processing contrary to the Law or these regulations.
- Legality: All processing of personal data must be appropriate for the purpose for which they have been collected, using the information that is necessary and sufficient, without excess.
- Proportionality: The processing of personal data is performed in accordance with the provisions established in the Law on Protection of Personal Data. The collection of personal data or by illegal means is prohibited.

3.17. Anonymization procedure: Processing of personal data that prevents the identification or that does not make the holder of these identifiable. The procedure is irreversible.

3.18. Dissociation procedure: Processing of personal data that prevents identification or that does not make the holder of these identifiable. The procedure is reversible.

3.19. Rectification: It is that generic action intended for affect or modify a personal data bank to update it or include information or specifically rectify its content with exact data.

3.20. Responsible for the Bank of personal data: The person in charge of each bank of personal data, and of the fulfillment of the requirements of the law on it.

3.21. Responsible for the Processing: It is the person who decides on the processing of personal data, even if they are not in a personal data bank.

3.22. Holder of personal data: Natural person to whom the personal data corresponds.

This corresponds to the translation of the Personal Data Protection Policy – (page 01 to 06)

16. Privacy policy: Systems/Procedures

3.23. Holder of the personal data bank: Determines the purpose and content of the personal data banks, their processing and security measures.

3.24. Processing of personal data: Any operation or technical procedure, automated or not, that allows the collection, registration, organization, storage, conservation, development, modification, removal, consultation, use, blocking, deletion, transfer or broadcast communication or any other another form of processing that facilitates access, correlation or interconnection of personal data.

3.25. Transfer of personal data: Any transmission, supply or manifestation of personal data, national or international, to a legal person under private law, to a public entity or to a natural person other than the holder of personal data.

RESPONSABILITIES

4.1. Data Bank Holder

- Responsible for coordinating with the National Authority for the Protection of Personal Data in the registration, modification or cancellation of Personal Data Banks.
- Responsible for coordinating with the Person in Charge of the Personal Data Banks in case of modifications, cancellation or registration of a new Personal Data Bank.
- Responsible for keeping a record of the changes generated in the Personal Data Banks.
- Responsible for responding to Personal Data Holders according to the resolution of their requests following the guidelines of the procedures for Attention to ARCO Requests.
- Responsible for alerting to the lack of response of the Person in Charge of the Personal Data Band, considering the response times established in the ARCO Request Attention procedure.

4.2. Person in charge of the Data Bank

- Responsible for identifying and reporting new repositories, data and means by which personal information is recorded.
- Responsible for the processing and safekeeping of the information contained in the Personal Data Bank under his responsibility.
- Responsible for responding before the annual audits in relation to the security controls of the Personal Data Bank under their responsibility.



16. Privacy policy: Systems/Procedures

- Responsible for coordinating the communication with the Holder of the Personal Data in case is necessary by a security incident to the Personal Data Bank under his responsibility.
- Coordinate with the Holder of the Personal Data Banks for the response in case of modification, cancellation or registration of a new Personal Data Bank.

- Authorize transfers of information when information is requested from the bank for which it is responsible.

4.3. Information Security

- Comply with the role of Security Representative of personal data banks, for which he will be responsible for coordinating the application of the Information Security Directive of the Law on Protection of Personal Data in CONTUGAS.
- Define the necessary security controls intended to prevent unauthorized access, loss or corruption during transit to your destination, taking into account the minimum security mechanisms required by the Law on Protection of Personal Data and its regulations.
- Periodically review the effectiveness of the security controls adopted for the protection of personal data banks and generate improvement actions.
- Implement controls related to Information Security as part of the adaptation plan to the requirements of the Personal Data Protection Law and its regulations.

4.4. User

- Perform an appropriate processing, as defined in this policy, to the information of personal data, and even sensitive data of customers, suppliers, collaborators, applicants, prospects and third parties of CONTUGAS.
- Protect information assets that contain personal data from unauthorized alteration, destruction or transfer.
- Adapt to the procedures defined by CONTUGAS according to the requirements of the Law on Protection of Personal Data and its Regulations.
- Report any incident that does not comply with this Information Security policy.
- Request authorization from the respective Person in charge of the Bank to transfer information.

16. Privacy policy: Systems/Procedures



4.5. Legal Advisor

- Provide legal advice to the different areas of CONTUGAS regarding the absolution of inquiries about the specifications required by the Law on Protection of Personal Data and its Regulations.

5. **POLICY DEVELOPMENT**

5.1. General Considerations

5.1.1. CONTUGAS must define those responsible for each personal data bank, which will have direct responsibility and will ensure compliance with this policy.

5.1.2. It is applicable to CONTUGAS all that requirement defined by the Law on Protection of Personal Data, unless it differs or contradicts any other specific applicable law, for which the latter will govern.

5.1.3. It is the responsibility of CONTUGAS to provide the information related to the processing of personal data to the National Authority for the Protection of Personal Data when it requires it, as well as allow access to the personal data banks that CONTUGAS manages.

5.1.4. Any person who works in CONTUGAS must sign a confidentiality agreement, through which protection of the information belonging to the Personal Data Banks is provided.

5.2. Obtaining personal data and consent of the holder of personal data

5.2.1. CONTUGAS prohibits the collection of personal data by fraudulent means, unfair or illegal. Such collection of personal data must be updated, necessary, pertinent and adequate, in relation to the determined, explicit and lawful purposes for which they were obtained. Similarly, the quality of the data contained in the personal data bank must be guaranteed, and the necessary security measures must be applied to help prevent the adulteration, loss and deviation of personal data.

5.2.2. Prior to any processing of personal data, the person in charge of each data bank responsible for capturing them, has the responsibility of ensuring that the consent of the holder of personal data is available, which must be prior, informed, express and unequivocally, they must also be collected and used for a specific, explicit and lawful purpose, so it should not be extended to another that has not been established at the time of collection.

16. Privacy policy: Systems/Procedures



5.3. Processing of Personal Data

5.3.1. The IT area must define the minimum security controls necessary in order to meet the requirements of the Law on Protection of Personal Data, as well as advise and monitor on the corresponding areas in order to the implementation of such controls is carried out.

5.3.2. The IT area is responsible for the protection of information assets that include personal data, in order to ensure their confidentiality, availability and integrity. As such, they are responsible for deleting personal data when they are no longer necessary or the deadline for their processing has expired, unless there is an anonymization or dissociation procedure.

5.4. Transfer of Personal Data

5.4.1. Those responsible for each data bank must ensure that any transfer of personal data has the consent of its data holder, unless for exceptions provided in the Law and its Regulations.

5.4.2. Any transfer of personal data, nationally and internationally, will proceed with the authorization of each person responsible for the personal data bank, and the means by which such data transfer will be carried out must comply with the information security policy in force. If it is necessary to carry out a cross-border flow of personal data, those responsible for each data bank must ensure that the recipient country maintains adequate levels of protection in accordance with current law.

5.5. Unauthorized alteration of the Personal Data Bank

5.5.1. Any transfer or use of the Automated Data Banks or any information associated with them outside the CONTUGAS environments must have the written authorization of the Person in Charge of the Personal Data Bank. The Information Systems that are within the scope of this Policy are: SAS, OPEN, GIS, Proximity Cards, Fingerprint System and Video Surveillance.

5.5.2. All personal information stored in a removable computer medium must be completely erased and/or evaluate the destruction of the means of transfer after his use; in a way that does not allow data recovery.

16. Privacy policy: Systems/Procedures

5.6.2. It will be the responsibility of each area to regularize current contracts with third parties by including the necessary addendum that include the terms of the law. If applicable, the legal area of CONTUGAS will provide advice to those responsible for the areas relating to the terms treated and defined in the contract.

5.7. Exercise of the Rights of the Holder of Personal Data

5.7.1. Personal data must be stored in such a way that allows the exercise of the rights of its holder.

5.7.2. CONTUGAS must enable the exercise of the rights of the holder of personal data:

5.7.3. Information Right:

- a) Purpose for which your data will be processed.
- b) Who are or may be its recipients.
- c) Identity and address of the holder of the personal data bank.
- d) The transfer of personal data.
- e) The consequences of providing your personal data and your refusal to do so.
- f) Data conservation time.

5.7.4. Access Right:

- a) Obtain the information, for free, that for itself is object for processing in databases.
- b) The way your data was collected.
- c) Reasons that motivated its collection.
- d) At the request of who the collection was made.
- e) Transfers made or which that are planning to do.

5.7.5. Rectification, cancellation and opposition Right:

- a) When omission, error or falseness has been noticed.
- b) When they are no longer necessary or relevant to the purpose for which they were collected.
- c) When the deadline for his processing has expired.



16. Privacy policy: Systems/Procedures



5.5.3. CONTUGAS, through the Holder of the Personal Data Bank, must designate the persons in charge of deleting the information of personal data contained in the removable computer means.

5.5.4. To maintain the security in copies or reproductions of the documents, the following measures must be followed:

- a) Only authorized reproduction equipment (printers, photocopiers, scanners) should be used.
- b) The process of copying or reproducing documents must be constantly monitored, preventing neglecting the equipment.
- c) Copied or reproduced documents cannot be left on the equipment; they must be removed immediately after the copy or reproduction is finished.
- d) Reproductions or copies of documents must be recorded with personal and/or sensitive data. The information to be recorded is:
 - Name of the person that require the copy.
 - Name of the person authorized to make copies.
 - Description of the personal data copied.
 - Number of copies.
 - Reason for copying.
 - Name of the person receiving the copy.
 - Destination place.
 - Validity period of the copy.

5.6. Hiring third parties that process personal data

5.6.1. Any third party with whom CONTUGAS shares personal data information must consider and comply, as part of the current service, with the requirements of the Law on Protection of personal data and its regulations, which must be officially approve by a contract signed by both parties.

5.6.2. It will be the responsibility of each area to regularize current contracts with third parties by including the necessary addendum that include the terms of the law. If applicable, the

16. Privacy policy: Systems/Procedures

5.8. EXCEPTIONS

5.8.1. All information belonging to requests for information that apply to any of these exceptions may be sent without requiring the authorization of the data bank manager; however, a record of the sending this information should be made:

- a) When they are necessary for the execution of a contractual relationship and that they are used exclusively for such purpose.
- b) When they are related to health and are used for a diagnosis or medical treatment.
- c) When they are granted within the framework of an administrative or judicial procedure.
- d) In the case of personal data contained or intended to be contained in sources accessible to the public.
- e) When personal data is used for the purpose of activities of historical, statistical or scientific value when a dissociation or anonymization procedure is used.

This corresponds to the translation of the Personal Data Protection Policy – (page 01 to 06)

- **Environmental Reporting - Assurance**

17. Environmental Reporting - Assurance



Contugas annually sends the Annual Environmental Compliance Report to the OEFA Environmental Assessment and Control Agency (entity attached to the Ministry of Environment). The responsibility of the OEFA is to supervise, evaluate and promote compliance with environmental obligations in economic agents and the improvement of the National Environmental Management System, in an articulated, effective and transparent manner, in order to safeguard the balance between investment in economic activities and environmental protection and thereby contribute to the sustainable development in Peru.

17. Environmental Reporting - Assurance



GRL-0115-2019



Lima, 28 de marzo de 2019

Señores:
ORGANISMO DE EVALUACION Y FISCALIZACION AMBIENTAL-OEFA
Av. Faustino Sánchez Carrión N° 603, 607 y 615
Jesús María. -

Asunto : Remitimos Informe Ambiental Anual correspondiente al año 2018

De nuestra consideración:

Sirve la presente para saludarlo cordialmente y, a su vez, remitirle en un CD adjunto a la presente el Informe Ambiental Anual correspondiente al ejercicio 2018 (documento PDF que contiene el Informe Ambiental y 6 anexos), de conformidad con lo establecido en el artículo 108 del Reglamento de Protección Ambiental en las Actividades de Hidrocarburos, aprobado por Decreto Supremo 039-2014-MEM¹.

Sin otro particular, es propicia la ocasión para expresarle los sentimientos de mi especial consideración.

Atentamente,

Jencarlos Vega Lugo
Apoderado
CONTUGAS S.A.C.

GRL -0115-2019
Lima, 28 March 2018

Dear Sirs:

[Assessment and Environmental Control Agency - OEFA](#)

Faustino Sánchez Carrión Ave. N° 603, 607 y 6015

Jesús María. -

Subject: We send the annual environmental report concerning 2018

From our consideration:

We greet you cordially and, in turn, we send you a CD attaching the Annual Environmental Report concerning 2018 (a PDF file which has the environmental report with its 6 annexes) as set out in the article 108 of the Regulation for Environmental Protection in Hydrocarbons Activities approved by the Supreme Decree 039-2014-MEM 1.

Having nothing further to add, let me express the feelings of my special consideration.

Sincerely,

Jencarlos Vega Lugo
Representative
CONTUGAS S.A.C.

Regulation for the environmental protection in hydrocarbons activities.

Article 108.- Obligations and commitments undertaken by the Holder of the Hydrocarbons activities

The people referred to in article 2 of these regulations are responsible for the project execution or the operation of Hydrocarbon Activities, before March 31st, they shall annually present a corresponding report of the previous year (Annex N°4), giving substantiated details about the regulatory compliance and measures, its complementary standards and environmental regulations that are applied will be sent to the Competent Authority for Environmental Auditing.

¹ Reglamento para la Protección Ambiental en las Actividades de Hidrocarburos.

Artículo 108.- Obligaciones y compromisos ambientales a cargo del Titular de la Actividad de Hidrocarburos. Las personas a que hace referencia el artículo 2 del presente Reglamento y que tienen a su cargo la ejecución de proyectos o la operación de Actividades de Hidrocarburos, presentarán anualmente, antes del 31 de marzo, un informe correspondiente al ejercicio anterior (Anexo N°4), dando cuenta detallada y sustentada sobre el cumplimiento de las normas y disposiciones de este Reglamento, sus normas complementarias y las regulaciones ambientales que le son aplicables, el cual será presentado a la Autoridad Competente en Materia de Fiscalización Ambiental, según corresponda.

- **Environmental Reporting - Quantitative Data**

18. Environmental Reporting - Quantitative Data



The coverage of our publicly available environmental indicators of our company is
> 75 % of revenues OR > 75 % of business operations

Energy and water management

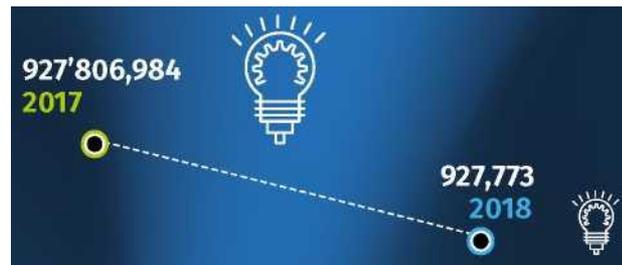
(302-1)(302-5)(306-1)

At Contugas, we are seeking to develop attitudes, habits and behaviors in collaborators, suppliers and visitors that contribute to energy and water consumption savings and efficiency.

To curb down energy consumption we have implemented “I Reduce”. This program seeks to raise awareness about the efficient use of power among collaborators and, under the Integrated Management System Policy framework, control the company’s energy consumption through monitoring.

In 2018, the consumption of energy purchased for the organization's activities was reduced.

Consumption of purchased energy



This corresponds to the translation of the Sustainable Management Report – 2018 (page 97)

18. Environmental Reporting - Quantitative Data



The coverage of our publicly available environmental indicators of our company is
> 75 % of revenues OR > 75 % of business operations

Consumption of purchased energy (KwH)

In terms of renewable energy, the energy produced by our solar panels feeds the main power supply system and, in turn, the control and communications dashboards. Additionally, we use a wind energy system as backup in the absence of photovoltaic energy.

Self-consumption energy generation

Power generation from renewable sources	Photovoltaic energy	Wind energy
2017	81.2 MW / Year	105.12 MW / Year
2018	2.3 MW / Year	2.8 MW / Year

As for water, Contugas does not use water in its natural gas distribution system operating process. However, water used is basically for human consumption and sanitary facilities. In 2018, no water sources were affected by our operations.

Total water consumption amounted to 5,954.20 m³, higher than what was reported in 2017 (2,912 m³). This rise is driven mainly by the inclusion of the water used at the City Gates of Nasca, Ica, and Huamay, and Pisco Operational Center in this year's quantification process.

As well, we carried out awareness-raising campaigns through advertising panels, internal mail, and educational talks, as part of the “I reduce” program.

This corresponds to the translation of the Sustainable Management Report – 2018 (page 97)

18. Environmental Reporting - Quantitative Data



The coverage of our publicly available environmental indicators of our company is
> 75 % of revenues OR > 75 % of business operations

Emissions and Carbon Footprint

(305-1)(305-2)

As we distribute natural gas consisting of methane (CH₄), which is a long-lasting and high-impact greenhouse gas, Contugas carefully controls its pipelines to prevent any possible leak. Furthermore, our activities are carried out in adherence with the regulations in force, seeking to fulfill the air monitoring commitments set forth in the Environmental Impact Assessment (EIA).

Direct and indirect emissions (t CO₂eq)



1,897.687223
Scope 1
201.2763971
Scope 2
219.724161
Scope 3

To reduce GHG emissions, Contugas has a Contingency Plan for the Natural Gas Distribution System in the department of Ica, as well as an Environmental Impact Assessment (EIA) and a Damage Prevention Plan that seeks to spread a prevention culture in excavations activities happening close to a gas network with the purpose of avoiding damages against such structures. Moreover, to obtain the ISO 14001:2015 Environmental Management System (EMS) certification has become our medium-term goal, and to implement water-and-energy-saving mechanisms or systems in all administrative offices is our long-term one. One of this year's highlights is that we, at Contugas, have curved down our nitrogen oxide emissions registered in 2017 – it slipped from 0.05 kg to 0.01 kg – and that we continue to have operations free from sulfur oxides emissions and other significant air pollutants.

This corresponds to the translation
of the Sustainable Management
Report – 2018 (page 99)

18. Environmental Reporting - Quantitative Data



Gestión de Residuos Sólidos

Contugas mantiene un firme compromiso de fortalecer en los colaboradores y contratistas una cultura ambiental que gestione adecuadamente y aproveche los residuos sólidos. Para ello, se realizan capacitaciones y jornadas de sensibilización.



27,73% menos
17.64
TM/Annual
Gracias a los
esfuerzos
desplegados en
Iniciativas como
Yo Reduzco

Se cuenta con el Plan de manejo de residuos sólidos en el cual se detallan acciones sobre el ciclo de vida de los residuos y se establecen mecanismos para una buena gestión. Sumado a ello, se cuenta con las siguientes herramientas de gestión de residuos: Procedimiento de Gestión de Residuos Sólidos, listado de clasificación y disposición de residuos, Plan de contingencia para el manejo de residuos, y Procedimiento de Identificación y Evaluación de Impactos Ambientales.

Gracias a los esfuerzos desplegados en iniciativas como “Yo Reduzco”, se logró mitigar el total de residuos a 17.64 TM/Annual (27,73% menos que lo registrado en el 2017). También se disminuyó el porcentaje de residuos peligrosos debido a que se realizaron solo actividades rutinarias, en comparación del 2017 cuando se realizó la actividad no rutinaria de inspección en línea que generó una gran cantidad de residuos.

Contugas maintains a solid commitment to strengthen an environmental culture in the employees and contractors that properly manages and benefits from the solid waste. To this effect, awareness events and trainings are conducted. There is a solid waste management plan that details actions of the waste life-cycle and establishes mechanisms for a good management. In addition to this, we have the following tools for waste management: Solid waste management procedure, classification and disposal list, contingency plan for waste management, and identification and evaluation environmental Impacts procedure. Thanks to displayed efforts in initiatives like “Yo reduzco”, a mitigation of 17.64 MT/Annual (27, 73% less than the one registered in 2017) in the total waste was achieved. Also, the percentage of hazardous waste was reduced due to the implementation of routine activities, compared to 2017, when non-routine online inspection activities generated a large amount of waste.

This corresponds to the translation of the Sustainable Management Report – 2018 (page 100 to 101)

18. Environmental Reporting - Quantitative Data



Waste Indicators

Indicadores de Residuos

	2017	2018
Total de residuos	24.41	17.64
Total de residuos	24.41 TM/Anual	17.64 TM/Anual
Total de residuos peligrosos (de acuerdo con la legislación nacional)	8.64 TM/Anual	1.61 TM/Anual
Porcentaje de residuos peligrosos	35,40%	9,13%
Total de residuos no peligrosos	15.78 TM/Anual	16.03 TM/Anual

Total Waste	2017	2018
Total waste	24.41 MT/Annual	17.64 MT/Annual
Total hazardous waste (according to domestic laws)	8.64 MT/Annual	1.61 MT/Annual
Hazardous waste percentage	35,40%	9.13%
Total non-hazardous waste	15.78 MT/Annual	16.03 MT/Annual

This corresponds to the translation of the Sustainable Management Report – 2018 (page 100 to 101)

18. Environmental Reporting - Quantitative Data



Target year: 2021

KPI	Target linked to the KPI
KPI 1: Energy consumption for administrative use	Reduce energy consumption by 3% for administrative offices compared to 2018.
KPI 2: Corporate carbon footprint	Reduce 0.5% of the corporate carbon footprint in relation to 2018.
KPI 3: Solid industrial waste	In process of definition - 2019

The coverage of our publicly available environmental indicators of our company is
> 75 % of revenues OR > 75 % of business operations

- **Coverage of Corporate Requirements/Guidelines**

19. Coverage of Corporate Requirements/Guidelines



Integrated Management System Policy



Contugas S.A.C, as a company from Energía Bogotá group, dedicated to natural gas distribution and marketing through pipeline network in the department of Ica, expresses its commitment to customer service quality, environmental care, health and safety of employees, contractors, suppliers, and visitors, information security, and business continuity according to the Group Corporate Policies, through:

The secure, ongoing, and reliable supply of natural gas meeting quality standards defined by its interest groups, and throughout the pipeline integrity management.

The pollution prevention and environmental care, through the identification, evaluation, and estimation of the environmental aspects and impacts.

The supply of safe and healthy environments to prevent job-related injuries and diseases, through hazard removal and occupational risk reduction, promoting a self-care and prevention culture.

The reassurance of the services and critical processes continuity within a tolerable period of time, and the supply of response actions when facing situations that affect continuity.

The protection of information assets, preserving its confidentiality, integrity, and availability.

The compliance of the legal prevailing applicable regulations and other voluntary signed requirements.

The involvement and consultation of interest groups and employees or their representatives.

The efficiency and ongoing performance improvement of our Integrated Management System.

Patricia Diaz Gazzolo
General Manager

This corresponds to the translation of the Integrated Management System Policy – 2018 (page 01 to 02)



- **Environmental Violations**

20. Environmental Violations



No, we have not paid any significant fines (> USD \$10,000) related to environmental or ecological issues in the past four fiscal years.

- **Public availability of EIA / SIA results**

21. Public availability of EIA / SIA results



In 2019, Contugas is performing the update of the environmental impact assessment, in which suggestion boxes were implemented in the Nazca, Ica, Pisco, and Chincha offices to receive contributions and recommendations of the update of the environmental impact assessment as part of the citizen participation mechanisms.

Moreover, the monitoring and citizen surveillance committees are implemented in the provinces of Nazca, Ica, Pisco, and Chincha to verify the compliance of the commitments established in the Contugas environmental impact assessment.

The trainings of the monitoring and citizen surveillance program and the participatory monitoring results dissemination have taken place and the reports of these monitoring tasks have been submitted upon request.

The social management with the people of our influence area has its origin in good relations that enables to generate and strengthen bonds of mutual trust in the framework of the assumed socioenvironmental commitments, which allows to have the interest group (all the population) as strategic allies, ensuring the continuity of our operations and working together to improve quality life in the households of our Ica region.

In Contugas we have the initiative to listen to any inquiry and/or provide clear and timely information to our people. For this reason, we possess various communication channels: Phone line 056-531919, website www.contugas.com.pe, social networks, Customer Service Centers (Chincha and Ica), and we also have a mobile office for the cities of Nasca and Marcona. All of these contribute to generate ongoing communication with our interest group, which at all times feels part of the activities we organized.

Yes, we have a Community Relationships Plan, established by EIA, in the Environmental Management Plan. Attached:

Assistance acts and environmental monitoring results dissemination, and the delivery of the Monitoring and Citizen Surveillance Program (PMVC) informational material.

Community relations meetings acts (agreement with the community)

Inquiry and delivery acts of environmental participatory monitoring reports.

Community Relations Plan.

21. Public availability of EIA / SIA results

Community Relations Minutes

Contugas	CTG-GSO-F-RC-005 ACTA DE REUNIÓN DE RELACIONES COMUNITARIAS	
	Acta de reunión N°: 01-2019-PMVC	Hora de inicio: 04:00 pm Hora de finalización: 06:00 pm
Ciudad y fecha: Pisco - 11/03/19		
Lugar de reunión: Centro de Atención al Cliente - Pisco de Contugas		

Agenda		
1. Organización de los roles y funciones del PMVC		
2. Aprobación y aprobación del Reglamento del PMVC		
3. Revisión del formulario de participación		
4. Difusión de resultados del Primer Encuesta Ambiental Participativa del II semestre 2018		

TEMAS ACORDADOS (A) – TEMAS INFORMADOS (I)	A	I
1. Se brinda capacitación de los roles y funciones del PMVC	X	X
2. Por unanimidad se aprobó el reglamento no teniendo observaciones al respecto.	X	
3. Se entregó un juego de los actas (en) formularios al presidente del CMSAP Pisco.		X
4. Se acordó con la Defensoría de los Derechos del Ambiente el Programa Participativo del II semestre 2018 el día jueves 04 de abril de 2019 a las 4:00 pm en las instalaciones del de Municipalidad Provincial de Pisco.	X	

ASISTENTES		
Nombre	Cargo	Firma
Armando Legua Sueldo	Presidente	<i>[Signature]</i>
Kaú Elra Verastegui Valenzuela	Secretaria	<i>[Signature]</i>
Dorothy Manuel Hernández Jurado	Fiscal	<i>[Signature]</i>

La firma de la presente documento el Participante otorga su consentimiento a Contugas para el tratamiento de los datos personales suministrados. La cual incluye el almacenamiento y transferir de los mismos a las autoridades competentes que corresponden. Contugas asegura que dentro de sus datos personales, en cumplimiento de la Ley N° 29733, Ley de Protección de Datos Personales y su Reglamento, el Participante otorga a Contugas el consentimiento a dichos datos personales cuando los suministra y utiliza en los que aparece su imagen y/o voz. En la misma, dicho consentimiento se otorga a todos los actores involucrados en el proceso a fin de que Contugas pueda cumplir con el objetivo de esta encuesta ambiental participativa. Contugas garantiza, dentro de sus actividades, que el Participante no será publicado o explotado dentro de su consentimiento o prestación de los servicios y datos, en los casos que se mencionan en el presente documento.

CONTUGAS	CTG-GSO-F-RC-005 COMMUNITY RELATIONS MINUTES			
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Minute N° 01-2019-PMVC Start time 04:00 pm End time 06:00 pm
 City and date Pisco – 03/11/19
 Meeting place Contugas Customer Service Center – Pisco

Program	
1.	PMVC roles and functions training.
2.	Division and approval of the PMVC regulation.
3.	Environmental forms revision.
4.	Environmental participatory monitoring results dissemination of the 2 nd semester of 2016.

Agreed issues (A) – Informed issues (I)		A	I
1.	PMVC roles and functions training were conducted.		X
2.	Unanimous approval of the regulation, no comments thereon.	X	
1.	Four (04) sets of forms were given to the CMSAP president – Pisco.		X
2.	It was agreed to conduct the environmental participatory monitoring results dissemination of the 2 nd semester of 2018 on Thursday the 4 th of April, 2019 at 4:00 p.m., in the facilities of the Pisco Provincial Municipality.	X	

ATTENDEES			
Name	Position	Signature	
Armando Legua Sueldo	President	<i>[Signature]</i>	
Kaú Elra Verastegui Valenzuela	Secretary	<i>[Signature]</i>	
Dorothy Manuel Hernández Jurado	Prosecutor	<i>[Signature]</i>	

“By signing this document, the Participant gives consent for the processing of the personal data provided, which includes its storage and transfer to the corresponding sectoral authorities. Contugas ensures the rights of the personal data holder, in accordance with the Law N°29733, Law on the Protection of Personal Data and its regulation. Moreover, the Participant gives Contugas the consent and exploitation rights on the photographs and videos in which his/her image or parts of it appears, this consent is extended to all natural and legal persons that Contugas shall hire for the purpose of using these images, understanding third parties as photographers, edition centers, marketing, etc. If the Participant is underage, the parents or guardians give their consent and rights on the photographs and videos in which the minor appears, in signing this record”.

21. Public availability of EIA / SIA results

List of participants - External events

Contugas		CTG-GSO-F-RC-006 LISTA DE PARTICIPANTES – EVENTOS EXTERNOS				
Fecha: 26.04.19	Hora Inicio: 03:40 pm	Lugar: FIAS - UNISLA				
	Hora Finalización: 05:30 pm	Área: Aéreo 309				
Tema: Difusión de resultados de monitoreo ambiental participativo de Contugas SAC						
Nombre y cargo del facilitador: Montoro del PMVC			Entidad Responsable: PMVC			
N°	Nombre	Cargo	Organización	Documento de Identidad	Teléfono fijo o Celular	Firma
1	ANITA GILBERTO TORO	FIAS	CHSAP-309	9524593	9524593	[Firma]
2	LUIS ZAMBRANO OLIVERA	Secretario	CHSAP-309	7202174	9524593	[Firma]
3	Elio Osvaldo Arango	miembro	PMVC	7682094	7682094	[Firma]
4	KAROL RIOS KORTA ZULUAGA	Estudiante	FIAS	8026539	99233965	[Firma]
5	HÉCTOR FERRER TAPIERO DIAZ	Estudiante	FIAS	8024381	95913399	[Firma]
6	Miguel Torres Mario Sotomayor	Estudiante	FIAS	9404034	9404034	[Firma]
7	RODRIGO NÚÑEZ DÍAZ	Estudiante	FIAS	7013774	9440093	[Firma]
8	Andrés Gutiérrez Taboada	Estudiante	FIAS	7014384	91148454	[Firma]
9	Romero Lorena Angarica	Estudiante	FIAS	7002260	94740725	[Firma]
10	Hernández Bonilla Klori	Estudiante	FIAS	7602236	96352294	[Firma]
11	KAROLINA RIVERA FERRER	Estudiante	FIAS	7160017	94243374	[Firma]
12	AGUIRRE CAROL ANA IS	Estudiante	FIAS	3940343	9402771	[Firma]
13	YAGO VIGILAN VILLAN BLANCO	Estudiante	FIAS	1203877	94113615	[Firma]
14	RAMON SUAREZ JESUS	Estudiante	FIAS	6089777	96430154	[Firma]
15	ANITA GILBERTO TORO	Estudiante	FIAS	—	—	[Firma]
16	YAGO VIGILAN VILLAN BLANCO	Estudiante	FIAS	7250276	94060400	[Firma]
17	Wendy Mercedes Jarama	Estudiante	FIAS	2082721	95233848	[Firma]
18	Cecilia del Jesus	Estudiante	FIAS	8771644	9248599	[Firma]
19	Camila Quintero Jorda	Estudiante	FIAS	70219510	92232052	[Firma]
20	Verónica Rojas León	Estudiante	FIAS	7000258	95313181	[Firma]
ESPACIO PARA DILIGENCIAR POR EL FACILITADOR						
Observaciones						
Se obsequiará mediante correo, diez (10) obsequios de merchandising en agradecimiento a la participación de la presente.						
Firma Facilitador: [Firma]						

Contugas		CTG-GSO-F-RC-006 LISTA DE PARTICIPANTES – EVENTOS EXTERNOS				
Fecha: 23.04.19	Hora Inicio: 04:00 pm	Lugar: Municipalidad Prod de Aéreo				
	Hora Finalización: 05:45 pm	Área: Aéreo				
Tema: Difusión de resultados de monitoreo ambiental participativo de Contugas SAC						
Nombre y cargo del facilitador: Montoro del PMVC			Entidad Responsable: PMVC			
N°	Nombre	Cargo	Organización	Documento de Identidad	Teléfono fijo o Celular	Firma
1	Carolina Mora Ochoa	Participante	—	43 03 04 94	933 80 159	[Firma]
2	Marta María Oliva Pico	Participante	—	46 46 5263	942044 00	[Firma]
3	Haydee Isabel Gomez Palencia	miembro	PMVC	22279530	—	[Firma]
4	WILSON FERRER TORRES	Participante	—	20050809	97592004	[Firma]
5	Diana del Rosendo	Participante	—	45823713	992330857	[Firma]
6	Carlos A Ramos Aguado	M.P.N	M.P.N	7039204	96335962	[Firma]
7	Isabella Alvarez Obando	Participante	—	76342250	95279210	[Firma]
8	Alfonso Pae José Arce Luna	Participante	—	7038912	96794241	[Firma]
9	EUGENIO SALGADO SANCHEZ	miembro	PMVC	41934724	99981030	[Firma]
10	Silvia Soledad Ortiz	Participante	—	22 422123	99581700	[Firma]
11	Ruth Rojas Rojas	Participante	—	26 09 6107	96 949973	[Firma]
12	JULIA DEL ROSARIO GONZALEZ	Participante	—	80015516	99405218	[Firma]
13	TUAN VIGILAN CAROL PARRA	Participante	—	95970032	94982506	[Firma]
14	JULIA SCHWARTZ ROSS	Participante	—	94245050	94245050	[Firma]
15	YAGO VIGILAN VILLAN BLANCO	Participante	—	4126166	97778224	[Firma]
16	JULIA GONZALEZ TORRES	Participante	—	1744444	96247704	[Firma]
17	Jessica Camilo Ramirez	miembro	PMVC	23100501	99736815	[Firma]
18	Jesse Torres Alvarado	Participante	AAH/SE	77607493	99828301	[Firma]
19	Miriam Gomez Ortiz	Participante	—	41319106	425200689	[Firma]
20	Rosa Vargas Alvaro	Participante	—	4225594	94683093	[Firma]
ESPACIO PARA DILIGENCIAR POR EL FACILITADOR						
Observaciones						
Se obsequiará mediante correo diez (10) obsequios de merchandising en agradecimiento a la participación de la presente.						
Firma Facilitador: [Firma]						

"A través de la suscripción del presente documento, el Participante otorga su consentimiento a Contugas para el tratamiento de sus datos personales consignados. Lo cual incluye el almacenamiento y traslado de los mismos a las entidades acaudaladas que corresponden. Contugas asegura los principios del Tratamiento de los datos personales, en cumplimiento de la Ley N° 25213, Ley de Protección de Datos Personales y su Reglamento. Así mismo, el Participante otorga a Contugas el consentimiento y derechos de explotación sobre las fotografías y videos en las que aparece su imagen o parte de la misma, dicho consentimiento se extiende a todas aquellas personas naturales o jurídicas a las que Contugas pueda acceder con el objeto de hacer dichos diagnósticos, estudios, acciones de acción, publicidad, etc. En caso que el Participante sea menor de edad, los padres o apoderados deberán su consentimiento y derechos sobre las fotografías y videos, en las cuales aparece el menor, al suscribir el presente registro".

21. Public availability of EIA / SIA results

List of participants - External events

Conti gas		CTG-GSO-F-RC-008 LISTA DE PARTICIPANTES - EVENTOS EXTERNOS				
Fecha: 04.04.19	Hora Inicio: 3:40 pm	Lugar: Municipalidad Prov. Páez				
	Hora Finalización: 5:00 pm	Área: Auditorio				
Tema: Difusión de resultados de monitoreo ambiental participativo de Contigás S.A.C.						
Nombre y cargo del facilitador: Membres del PHVC			Entidad Responsable: PHVC			
N°	Nombre	Cargo	Organización	Documento de Identidad	Teléfono tipo Celular	Firma
1	STEFAN VILLALBA	Colaborador	TV	22237001	7268894	[Firma]
2	Diego Ramos Velazco	Asesor	PHVC	75822334	8902123	[Firma]
3	FRAJERÍA VILLALBA	Asesor	PHVC	72522334	2555 5111	[Firma]
4	LUIS FERRER	Asesor	PHVC	22237793	376166078	[Firma]
5	Arturo Ruiz	Asesor	PHVC	22237793	376166078	[Firma]
6	Georgina	Asesor	PHVC	22237793	376166078	[Firma]
7	Diego	Asesor	PHVC	22237793	376166078	[Firma]
8	Diego	Asesor	PHVC	22237793	376166078	[Firma]
9	Diego	Asesor	PHVC	22237793	376166078	[Firma]
10	Diego	Asesor	PHVC	22237793	376166078	[Firma]
11	Diego	Asesor	PHVC	22237793	376166078	[Firma]
12	Diego	Asesor	PHVC	22237793	376166078	[Firma]
13	Diego	Asesor	PHVC	22237793	376166078	[Firma]
14	Diego	Asesor	PHVC	22237793	376166078	[Firma]
15	Diego	Asesor	PHVC	22237793	376166078	[Firma]
16	Diego	Asesor	PHVC	22237793	376166078	[Firma]
17	Diego	Asesor	PHVC	22237793	376166078	[Firma]
18	Diego	Asesor	PHVC	22237793	376166078	[Firma]
19	Diego	Asesor	PHVC	22237793	376166078	[Firma]
20	Diego	Asesor	PHVC	22237793	376166078	[Firma]

Conti gas		CTG-GSO-F-RC-008 LISTA DE PARTICIPANTES - EVENTOS EXTERNOS				
Fecha: 04.04.19	Hora Inicio: 3:40 pm	Lugar: Municipalidad Prov. Páez				
	Hora Finalización: 5:00 pm	Área: Auditorio				
Tema: Difusión de resultados de monitoreo ambiental participativo de Contigás S.A.C.						
Nombre y cargo del facilitador: Membres del PHVC			Entidad Responsable: PHVC			
N°	Nombre	Cargo	Organización	Documento de Identidad	Teléfono tipo Celular	Firma
1	Diego	Asesor	PHVC	22237793	376166078	[Firma]
2	Diego	Asesor	PHVC	22237793	376166078	[Firma]
3	Diego	Asesor	PHVC	22237793	376166078	[Firma]
4	Diego	Asesor	PHVC	22237793	376166078	[Firma]
5	Diego	Asesor	PHVC	22237793	376166078	[Firma]
6	Diego	Asesor	PHVC	22237793	376166078	[Firma]
7	Diego	Asesor	PHVC	22237793	376166078	[Firma]
8	Diego	Asesor	PHVC	22237793	376166078	[Firma]
9	Diego	Asesor	PHVC	22237793	376166078	[Firma]
10	Diego	Asesor	PHVC	22237793	376166078	[Firma]
11	Diego	Asesor	PHVC	22237793	376166078	[Firma]
12	Diego	Asesor	PHVC	22237793	376166078	[Firma]
13	Diego	Asesor	PHVC	22237793	376166078	[Firma]
14	Diego	Asesor	PHVC	22237793	376166078	[Firma]
15	Diego	Asesor	PHVC	22237793	376166078	[Firma]
16	Diego	Asesor	PHVC	22237793	376166078	[Firma]
17	Diego	Asesor	PHVC	22237793	376166078	[Firma]
18	Diego	Asesor	PHVC	22237793	376166078	[Firma]
19	Diego	Asesor	PHVC	22237793	376166078	[Firma]
20	Diego	Asesor	PHVC	22237793	376166078	[Firma]

Se observaron por parte de diez (10) personas con marchas lentas en agradecimiento a la participación de los presentes.

Firma Facilitador: [Firma]

Se observaron por parte de diez (10) personas con marchas lentas en agradecimiento a la participación de los presentes.

Firma Facilitador: [Firma]



- **EP - Direct Greenhouse Gas Emissions (Scope 1)**

22. EP - Direct Greenhouse Gas Emissions (Scope 1)



Direct GHG (Scope 1)	Unit	FY 2015	FY 2016	FY 2017	FY 2018
Total direct GHG emissions (Scope 1)	metric tonnes CO2 equivalents	180.58	359.59	25 456.58	1897.69
Data coverage:	percentage of: operation	60	85	100	100

According to 2017, it is stated that the pipeline inspection activities with smart duct scrapers in compliance with Art. 6 of the RCD 005-2016-OS/CD increased the measurements of that year, in this article is indicated that within the first 05 years of the beginning of commercial operations, pipeline inspections shall be performed.

In order to perform this activity, the burning of natural gas was conducted. It is worth mentioning that the burning of natural gas is a combustion cleaner than other fossil fuels. As a company responsible for the environmental compliance, Contugas chose to conduct the burning of natural gas instead of vents, since this last one is harmful for the environment.

Article 6.- Inspection, monitoring, and testing procedure.

In order to reduce the fluid releasing risk, the Concessionaire shall:

6.1. Conduct pipeline inspections that operate a MAPO of 50 BARG or more with “smart pigs” or smart duct scrapers, within the first five (05) years of the beginning of commercial operations and, according to the obtained results, the frequency of future operations will be defined, which will be approved by Osinerming, and shall not exceed five (05) years. This requirement shall not apply for duct derivations to regulation stations, industrial connections, and thermal power stations.

- **EP - Indirect Greenhouse Gas Emissions (Scope 2)**

23. EP- Indirect Greenhouse Gas Emissions (Scope 2)



IGHG (Scope 1)	Unit	FY 2015	FY 2016	FY 2017	FY 2018	
Indirect greenhouse gas emissions from energy purchased and consumed (scope 2)	metric tonnes CO2 equivalents	184.23	212.10	201.29	200.39	195.25
Data coverage	percentage of: operation	80	90	95	100	

DATA CONSISTENCY

The information in the sustainable management report for 2016 and 2018 differ from the table, the reason is that when the information was sent for the preparation of the report, the information for the month of December was pending, so this information was averaged over the other months. It is indicated that the information in the table is less in relation to what is published in the 2016 and 2018 sustainable management report.

- **EP - Energy Consumption**

24. EP - Energy Consumption



Total energy consumption	Unit	FY 2015	FY 2016	FY 2017	FY 2018	What was your target for FY 2018?
Non-renewable fuels (nuclear fuels, coal, oil, natural gas, etc.) purchased and consumed	MWh		496.4446	556.2952	92'619.7556	
Non-renewable electricity purchased	MWh	0.849149	0.854071	927.807	924	Reduction of energy consumption of administrative offices by 3% compared to 2017
d) Total renewable energy	MWh	-	-	0.00946	0.012319	
TOTAL NON-RENEWABLE ENERGY CONSUMPTION	MWh	0.84915	497.29867	1'484.1022	93'543.7556	
Data coverage	percentage of: operation	80	90	95	100	

DATA CONSISTENCY

The data in the previous chart differ from our publicly reported figures in the 2016 and 2018 sustainable management reports, because when those reports were elaborated we used the average of the other months for the month of December. It is stated that the information in the chart is less compared to the sustainable management report published in 2016 and 2018.

- **EP - Water Consumption**

25. EP - Water Consumption



Water Consumption	Unit	FY 2015	FY 2016	FY 2017	FY 2018
A. Withdrawal: Total municipal water supplies (or from other water utilities)	Million cubic meters	0.00087	0.0028438	0.003029	0.006062
E. TOTAL NET FRESH WATER CONSUMPTION (A+B+C-D)	Million cubic meters	0.00087	0.0028438	0.003029	0.006062
Data Coverage (as % of denominator)	percentage of: operation	Se desconoce la cobertura	80	80	100

DATA CONSISTENCY

The data in the previous chart differ from our publicly reported figures in the 2017 and 2018 sustainable management reports, because when those reports were elaborated we used the average of the other months for the month of December. It is stated that the information in the chart is less compared to the sustainable management report published in 2017 and 2018.

It is stated that in 2018, quantification has been improved due to the integration of water consumption from Nasca City Gate, Pisco Operational Center, Humay City Gate, and Ica City Gate, which was not considered in previous years.

- **EP - Waste**

26. EP - Waste



Waste Disposed	Unit	2015	2016	2017	2018
Total waste generated	metric tonnes	4.55	5.64	24.41	16.75
Total waste disposed	metric tonnes	9 610.00	7 967.00	9 205.00	8 448.00
Data Coverage (as % of denominator)	percentage of: operation		40	70	60

DATA CONSISTENCY

The data in the previous chart differ from our publicly reported figures in the 2017 and 2018 sustainable management reports, because when those reports were elaborated we used the average of the other months for the month of December. It is stated that the information in the chart is less compared to the sustainable management report published in 2017 and 2018.

By 2016, only the information of 40% coverage of the amount of waste generated was considered.

In 2017, a large amount of hazardous waste was generated due to the pipeline inspection activity with smart duct scrapers in compliance with Art. 6 of the RCD 005-2016-OS/CD.

It is indicated that the information of the waste generated in the administrative offices is not considered, it is mainly from the industrial part

- **Biodiversity Commitment**

27. Biodiversity Commitment

Our Commitment To Biodiversity

This corresponds to the translation of the Sustainable Management Report – 2018 (page 93 to 95)



Contugas environmental management focuses on minimizing any negative effect in the environment; identifying, comprising and reducing the environmental impacts that might be caused by the activities of the operation.

Contugas develops its operations within the framework of respect for territorial, social, legislative, and biological diversity and for the archeological, historical, and cultural legacy of the area where we work.

Our company works along with the compliance of the Corporative Environmental Policy from the Grupo Energía Bogotá, which establishes action guidelines under the approach of continuous improvement to achieve goals of eco-efficiency on energetic performance, waste management, water consumption, biodiversity protection, and climate change.

We possess an Environmental Management Plan in which prevention, control and mitigation measures of the natural gas distribution system of environmental impacts are detailed, containing: To establish a control and maintenance of the right of way, as well as to conduct foot patrols to verify the condition of the right of way; to minimize the environmental and social impacts, conducting an appropriate management of the solid waste generated during the project in all its stages; follow-up and monitoring of the San Fernando National Reserve; among other measures.

Another approach for environmental risk management is the Damage Prevention Plan, which is meant to assure the safety of the workers, to prevent damages to the natural gas facilities that risk people's physical integrity and property, and to reduce gas emissions from a possible air pollution due to a failure in the natural gas distribution network. As a consequence of the environmental management system and the implemented measures in 2018, we have not admitted any environmental penalties.

27. Biodiversity Commitment

Biodiversity Management (304-1) (304-2) Biodiversity Management represents one of the main axes of the Contugas environmental strategy since the company affects two areas of high value: San Fernando Natural Reserve and Paracas Natural Reserve.

Paracas Natural Reserve

Located in Ica, it is one of the categorized Protected Natural Areas (ANP in Spanish) that preserves representative samples of the coastal-marine ecosystems. Its importance lies in the preservation of a great biodiversity essential for the storage of several biological cycles that ensures species conservation, as well as income generation for the locals. Furthermore, it preserves archaeological remains of the Paracas culture that developed throughout a great part of this relevant area. The faunal species declared vulnerable in the Protected Natural Area are the Peruvian diving petrel, the fur seal, the otter, the green sea turtle, the Atlantic ridley sea turtle, and the Hawksbill sea turtle.

San Fernando National Reserve

High value coastal-marine ecosystems are preserved within this reserve, such as benthic species, and marine and coastal fauna in the influence area of the project components. In this protected natural area, there are vegetal ecosystems like Tillandsia and short-sized cacti, as well as guanacos. According to the update of the ranking and categorization list of the endangered wildlife species, the guanaco is considered an endangered species in Peru. There is an interinstitutional cooperation agreement concluded with the National Service of Natural Areas protected by the Government (SERNANP in Spanish), in which commitments that contribute to biodiversity conservation in San Fernando Reserve have been made. These include monitoring the Tillandsia, environmental sensibilization campaigns, and signaling pathways within the reserve. These commitments are part of the “Reservando Vida” program, which mainly focuses on the preservation of the guanaco species and Tillandsia plants. Moreover, as part of “Reservando Vida”, Contugas provided two four-wheelers and a drone to monitor the activities in the reserve, an appropriate area was provided to SERNANP to conduct monitoring actions, and the cleaning campaign of the estuary of Grande River and Santa Ana beach took place. All the commitments assumed by the company have been fulfilled in 2018.

In 2018, in order to execute an appropriate biodiversity management, Contugas performed an analysis of its potential impacts in the San Fernando National Reserve as well as in the Paracas National Reserve.

This corresponds to the translation of the Sustainable Management Report – 2018 (page 93 to 95)

27. Biodiversity Commitment



Potential Impacts On Biodiversity

Potenciales impactos sobre la biodiversidad



Impactos significativos sobre la biodiversidad

Transformación de hábitat



Impactos directos

Cambio en la abundancia y diversidad de la cobertura vegetal

Cambios en la composición, abundancia y diversidad de la fauna existente



Impactos indirectos

Generación de expectativas para investigación de la especie por parte de universidades



Impacto positivo

En base al resultado del monitoreo biológico se ha identificado que la vegetación de Tillandsia trasplantada viene siendo recuperada en el área



Extensión de las zonas que han sufrido impacto

218,21 Hectáreas



Especies afectadas por el impacto

Tillandsia



Impacto negativo

Para la gestión del 2018 no se han detectado impactos negativos

Considerable Impact on Biodiversity	Direct Impact	Indirect Impact	Positive Impact
Environment change	Change in the abundance and diversity of vegetation. Change in the composition, abundance and diversity of the existing fauna.	Expectancy generation for universities to investigate the species.	According to biological monitoring, transplanted Tillandsia vegetation has been identified and recovered in the area.

Impact Area Extension	Affected species	Negative Impact
218,21 hectares	Tillandsia	No negative impacts have been identified for the 2018 management.

This corresponds to the translation of the Sustainable Management Report – 2018 (page 93 to 95)

- **Shared value - Social Management - Contugas**

28. Shared value - Social Management - Contugas



At Contugas, we are committed not only to the natural gas massification process in the region of Ica, but also to the development our stakeholders. Therefore, we implemented the following shared value programs.

Nutri Contugas:

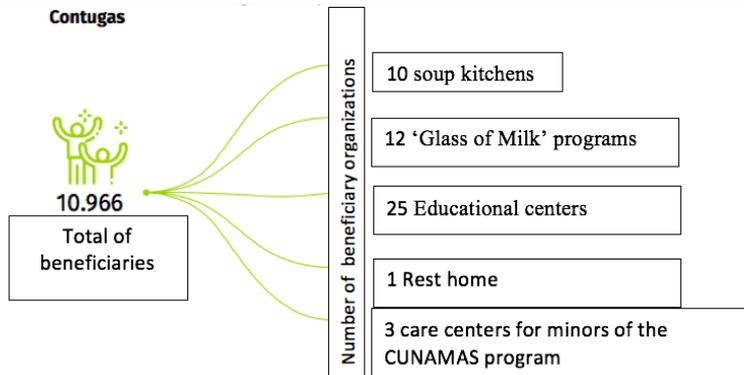
The coverage of our publicly available Social indicators of our company is
> 75 % of revenues OR > 75 % of business operations

The objectives of this program are three-fold:

- To facilitate a free connection to natural gas service to soup kitchens, members of the 'Glass of Milk' program, and public educational centers in the Ica region.
- To drive the empowerment of women working in grassroots organizations by strengthening their entrepreneurship capacities.
- To enhance the infrastructure of their premises, and to promote a nutritious and healthy diet.

During 2018, 12 workshops were held at grassroots organizations and educational centers on nutrition, leadership, empowerment, entrepreneurship, good practices for handling food and care of the environment.

Number of free connections and beneficiaries of Nutri Contugas:



This corresponds to the translation of the Sustainable Management Report – 2018, pages 84 to 87 and from 88 to 91

28. Shared value - Social Management - Contugas



Contugas Social Programs

Furthermore, as part of the program, two infrastructures were renovated: in Chinchá, the María Reyna de la Paz soup kitchen and, in Ica, the Hilda Salas 'Glass of Milk' program. Now, both are serving 234 people. These revamps included the clearing of all areas, laying the floor and building the roof, plus painting the infrastructure. In 2019, the project 'Mujer Emprendedora' or Businesswomen project will be implemented to enhance women's knowledge and skills so that they can start their own business. By doing so, the beneficiaries will be able to earn enough revenues for their organizations as the resources assigned to these by the government are not enough to guarantee appropriate nutrition for the children. Additionally, we are planning to promote the uses and benefits of natural gas among our partners and users to eradicate the myths surrounding this fuel.

Crecer program:

Through this program, high school students hone their literary skills to participate in the "Cuentigas" regional literary contest. Also, elementary school students learn about the benefits of natural gas through playful experiments and enjoy better educational environment thanks to the delivery of school kits.

Previene: Educational Plan for the Prevention and Integrity of Gas Pipelines

In 2018, Contugas continued to promote a culture of natural gas among the population living in its area of influence through activities implemented by Previene. These activities seek to strengthen a culture of information, education, and prevention centered on the protection of human life and the proper care of natural gas networks.

**The coverage of our publicly available Social indicators of our company is
> 75 % of revenues OR > 75 % of business operations**

This corresponds to the translation of the Sustainable Management Report – 2018, pages 84 to 87 and from 88 to 91

28. Shared value - Social Management - Contugas



Contigo: Corporate Volunteering Program

Seeking to strengthen our culture of service and corporate values among Contugas employees, Contugas promotes different corporate volunteering activities intended to contribute to the creation of shared value in the communities we touch upon and to establish a genuine relationship with our stakeholders. Human rights, gender, and community participation are at the core of the management of Contigo's corporate volunteering program which was devised in alignment with Contugas' Sustainable Development Policy, the 2030 Agenda, and the Principles of the UN Global Compact. Therefore we can say that our volunteering actions respond to the development of the social and environmental pillars.

Paraqa Heritage Education Program:

This program seeks the progressive revaluation of the archaeological heritage of the Ica region. To this end, the program is focusing on disseminating the cultural value of the region's paleontological, archaeological, and historical evidence.

Transmedia Program:

Journalists improve and hone their skills, as well as their knowledge regarding the natural gas sector through this capacity-building program that uses an innovative communication mechanism based on spaces for dialogue, forums and training.

The coverage of our publicly available Social indicators of our company is
> 75 % of revenues OR > 75 % of business operations

This corresponds to the translation of the Sustainable Management Report – 2018, pages 84 to 87 and from 88 to 91

- **Diversity**

29. Diversity in Contugas



Total employees, by type of contract, location and sex

Total de colaboradores, por tipo de contrato, locación y sexo

(102-7) (102-8) (401-1)

Colaboradores por tipo de contrato y género	2017			2018			%
	Lima	Ica	TOTAL	Lima	Ica	TOTAL	
A plazo indeterminado	55	73	128	54	83	137	76,97
Femenino	22	13	35	23	15	38	27,23
Masculino	33	60	9	31	68	99	72,26
A plazo fijo	8	44	52	17	24	41	23,03
Femenino	5	10	15	7	5	12	29,27
Masculino	3	34	37	10	19	29	70,73
Practicantes	12	13	25	14	13	27	100(*)
Femenino	5	5	10	6	4	10	37,04
Masculino	7	8	15	8	9	17	62,96

Employees by sex, job category and relationship between salary basis and remuneration of women compared to mens

Colaboradores por sexo, categoría laboral y relación entre el salario base y la remuneración de las mujeres en comparación con los hombres (102-7) (405-2)

Categoría	Puesto	Mujeres	Hombres	% Variación Mujeres	% Variación Hombres
Alta Gerencia	Gerentes	2	3	262,5	355,0
	Sub gerentes	2	11	143,2	177,0
Jefatura	Supervisores	1	7	64,1	83,9
	Cordinadores	20	10		
Profesionales	Analista Senior	8	14	25,92	24,06
	Analista	20	31		
Soporte	Asistente	6	4		
	Auxiliar	0	11	22,0	18,2
	Técnico	1	27		
Practicantes	Practicantes	10	17	10,68	10,68

- **Global Compact & Human Rights**

30. Global Compact & Human Rights



Compliance with the UN Global Compact Principles



Contugas has been adhering to the United Nations Global Compact since 2010. During 2018, our commitment has been reflected as follows:

Principle 1 – Human Rights:

"Businesses should support and respect the protection of internationally-recognized fundamental human rights within their sphere of influence."

By 2018, 100% of our collaborators have a permanent position (see chapter: Human Capital of Contugas).

Contugas' Corporate Sustainability Policy and the implementation of actions are part of our Sustainable Development Plan and Community Relationship Plan. In them, the company's shared value projects are found. (see chapters: About Contugas and Environment Development).

Nutri Contugas served as a launching pad for the overall improvement of soup kitchens. This was done through training, infrastructure renovations, leading the empowerment of women in grassroots organizations by strengthening their entrepreneurial capacities (see chapter Development of the Environment).

This corresponds to the translation of the Sustainable Management Report – 2018, pages 116 to 123

30. Global Compact & Human Rights



Principle 2 – Human Rights:

“Business shall make sure they are not complicit in human rights abuses.”

Contugas has an Ethics Channel for the prevention, detection, investigation, and rectification of any illegal act or misconduct. This tool is made available to all stakeholders for reporting non-compliances, including human rights (see chapter: Ethics and transparency).

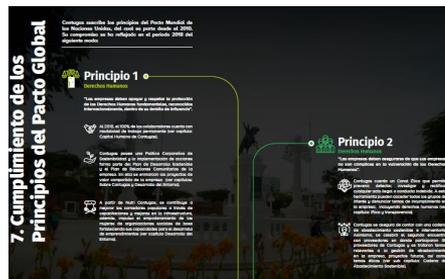
Contugas ensures the sustainability and auditing of its supply chain. Moreover, in the second supplier’s meeting, 35 Contugas suppliers attended to discuss topics **related to the company's supply management, future projects, as well as ethical issues** (see subchapter: Sustainable Supply Chain).

Principle 3 – Labor standards:

“Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.”

All of our employees have the possibility of forming and joining the union of their choice without fear of reprisals. However, currently, there are no unions in Contugas (see chapter: Contugas Human Capital).

We maintain ongoing communication with the collaborators about the agreements or organizational changes that take place. To this end, in 2018, the Human Capital Management (HCM-SAP) module was implemented. It allows for the efficient management and integration of all human capital information and processes (see chapter: Contugas Human Capital).



This corresponds to the translation of the Sustainable Management Report – 2018, pages 116 to 123

30. Global Compact & Human Rights



Principle 4 – Labor standards:

“Businesses should support the elimination of all forms of forced and compulsory labor.”

Contugas rejects any type of forced labor, discrimination, harassment or aggression in the workplace.

A minimum set of criteria and standards on environmental, social and corporate governance issues are used to evaluate suppliers (see subchapter: Sustainable Supply Chain).

Contugas promotes initiatives and new ways of working that strengthens our collaborators’ balance between work and family life (see chapter: Contugas’ Human Capital).

Principle 5 – Labor standards:

“Businesses should support the effective abolition of child labor”

Contugas is strongly committed to child development with an emphasis on education. For this reason, we develop social programs that benefit children such as ‘Cuentigas’. This is a project that strengthens children’s literary writing skills and, also, delivers school kits (see chapter: Development of the Environment).

Suppliers are evaluated based on criteria and minimum standards related to environmental, social, and good corporate governance (see subchapter: Sustainable Supply Chain).

Principle 6 – Labor standards:

“Businesses should support the elimination of discrimination in respect of employment and occupation”

Contugas, through the Strategic Model of Human Management and its strategic plan, prioritizes the protection of life, and the well-being and development of its human capital, such as Allocation, weekly rest period, working day, medical leave, benefits, among others (see chapter: Contugas Human Capital).

Besides, we give maternity and paternity leave and encourage the enrollment of young talents into the organization granting them the same rights as other workers (see chapter: Contugas Human Capital).

The company has a paid internship program. In 2018, 27 young professionals were able to perform in our work environment and enhance their learning. Our interns enjoy the same health and wellness benefits as our permanent collaborators (see chapter: Contugas Human Capital).

This corresponds to the translation of the Sustainable Management Report – 2018, pages 116 to 123

30. Global Compact & Human Rights



Principle 7 – Environment:

“Businesses should support a precautionary approach to environmental challenges.”

The environmental impacts of our 517 supplier's operations were evaluated. No negative impacts were identified as a result of their activities (see subchapter: Sustainable Supply Chain).

To contribute to the reduction of climate change, Contugas actively monitors its carbon footprint (see subchapter: Environmental Management).

Also, Contugas 'Yo Reduzco' or I Reduce program encourages energy efficiency in our operations, thus mitigating our CO2 emissions and responding to climate change (see subchapter: Environmental Management).

Principle 8 – Environment:

“Businesses should undertake initiatives to promote greater environmental responsibility.”

Contugas has signed an inter-institutional cooperation agreement with the National Service of Natural Areas Protected by the State – SERNANP (see sub-chapter: Environmental Management).

We have several tools for waste management such as the Solid Waste Management Plan, Solid Waste Management Procedure, Contingency Plan for Waste Management, among others (see subchapter: Environmental Management).

Contugas promotes recycling through our 'Yo Reduzco' program (see subchapter: Environmental Management).

'Contigo', our corporate volunteering program, organize different environmental actions that are carried out by our employees and the local community. In 2018, the program cleaned up the Ica river and Santa Anta beach, promoted trees planting activities and organized parades with environmental messages (see chapter: Development of the environment).

This corresponds to
the translation of the
Sustainable
Management Report
– 2018, pages 116 to
123

30. Global Compact & Human Rights



Principle 9 – Environment:

“Businesses should encourage the development and diffusion of environmentally-friendly technologies.”

The company supports the development of technologies and innovation by generating added value to basic products. Along these lines, Contugas has endorsed projects on cogeneration and change of energy matrix in buses as measures that are more sustainable (see chapter: Our value proposal).

Principle 10 – Anti-Corruption:

“Businesses should work against corruption in all its forms, including extortion and bribery.”

The objective of Contugas’ Ethics and Compliance Committee is to contribute to the strengthening of ethical behaviors in the company, and implementing coordinated actions to address events or behaviors contrary to the provisions outlined in the Code of Ethics (see chapter: Ethics and Transparency).

Our Ethics Channel is available to all of our stakeholders to enable the prevention, detection, investigation, and rectification any illegal act or misconduct (see chapter: Ethics and Transparency).

Contugas’ financial and accounting results, together with our Sustainable Management Report, guarantee compliance with the principles of good corporate governance (see appendix).

Every year, Contugas submits its Governance Corporate Report and the Sustainable Management Report, as part of our guidelines (see annex).

This corresponds to the translation of the Sustainable Management Report – 2018, pages 116 to 123

- **Sustainability Model and Alignment with SDGs**

31. Sustainability model and alignment with SDGs



Modelo de sostenibilidad y alineación con los ODS

Para gestionar el Desarrollo Sostenible, Contugas adopta el Modelo de Sostenibilidad y Creación de Valor Compartido del Grupo Energía Bogotá.

Modelo de sostenibilidad

Política de sostenibilidad
Grupo Energía Bogotá

Gestión de riesgos e impactos

- Ambiental
- Social
- Cultural
- Seguridad y salud en el trabajo
- Anticorrupción

Grupos de interés

- Accionistas e inversionistas
- Clientes
- Colaboradores
- Autoridades
- Comunidades
- Formadores de opinión
- Proveedores

Legitimidad

Contribuir al desarrollo • Alcanzar estrategias • Presencia permanente • Gestión de riesgo • Cumplimiento normativo • Valor compartido • Relacionamento genuino

Para el Grupo Energía Bogotá, el relacionamiento genuino, la presencia permanente en las regiones y la legitimidad son los ejes del modelo para generar valor compartido, progreso y desarrollo en Latinoamérica.

Asimismo, a través de los Objetivos de Desarrollo Sostenible la empresa refuerza su estrategia de sostenibilidad ya que contribuyen a mejorar el relacionamiento con los grupos de interés, refuerzan los programas de valor compartido y fortalecen la reputación de Contugas. La estrategia de Contugas contribuye en el alcance de 12 de los objetivos, focalizando las acciones, promoviendo alianzas estratégicas e involucrando los objetivos prioritarios en la estructuración de lo que planear.

Sustainability model and alignment with SDGs

To succeed in Sustainable Development, Contugas adopts the Sustainability and Creating Shared Value model of Grupo Energía de Bogotá:

Sustainability Model
Sustainability Policy - Grupo Energía de Bogotá

Risk and Impact Management
Environment
Social
Cultural
Occupational health and safety
Anticorruption

Stakeholders
Shareholders and investors
Clients
Collaborators
Authorities
Communities
Opinion leaders
Suppliers

This corresponds to the translation of the Sustainable Management Report – 2018 (page 21)

31. Sustainability model and alignment with SDGs



For Grupo Energía de Bogotá, the pillars for generating shared value, progress and development in Latin America are a true relationship, ongoing presence in the regions, and legitimacy. Likewise, through the Sustainable Development Objectives, the company reinforces its sustainability strategy since these contribute to improve its relationship with stakeholders, reinforce the shared value programs and strengthen Contugas' reputation.

Contugas' strategy contributes to the achievement of 12 of the SDGs by focusing its actions, promoting strategic alliances and including the prioritized goals in the structure of its plans.



This corresponds to the translation of the Sustainable Management Report – 2018 (page 21)

31. Sustainability model and alignment with SDGs

Contribution to SDGs

7. Aporte a los Objetivos de Desarrollo Sostenible



This corresponds to the translation of the Sustainable Management Report – 2018 (page 114-115)

Contribution to Sustainable Development Goals

SDG 2 – Zero hunger

Contugas wants to contribute to ending all forms of malnutrition by building capacity into soup kitchens and 'Vaso de Leche' or Glass of Milk programs through training and workshops targeting its members, and through Nutri Contugas program also by improving their infrastructure.

SDG 5 – Gender Equality

Contugas is committed to supporting gender equality by building capacity for decent work and entrepreneurship, as well as reducing inequalities.

SDG 6 – Clean water and sanitation

The company maintains a firm commitment to nurturing attitudes and habits that contribute to the efficient use of this resource. For example, we have developed the program 'Yo Reduzco', or I Reduce, which entails campaigns to raise awareness on proper water management.

SDG 7 – Affordable and clean energy

By distributing and selling natural gas, Contugas drives the adoption of clean energy among the communities, businesses, and industries in the region.

SDG 8 – Decent work and economic growth

Contugas contributes to this Sustainable Development Goal through our 'Escuela de Empresarios' program. This program seeks to teach our business partners how to develop strategies that promote the growth of their businesses.

SDG 9 – Industry, innovation, and infrastructure

The company supports the development of technologies and innovation by adding value to basic products. Along these lines, Contugas has led cogeneration and energy matrix change projects.

SDG 11 – Sustainable cities and communities

Contugas is firmly committed to protecting natural heritage while contributing to inclusive, safe, resilient, and sustainable cities and human settlements.

SDG 12 – Responsible consumption and production

Several tools guide waste management, such as the Solid Waste Management Plan, the Solid Waste Management Procedure, plus the 'Yo reduzco' program.

SDG 13 – Climate action

To contribute to the abatement of climate change, we control our carbon footprint by gathering and analyzing Contugas' environmental management information.

SDG 15 – Life on land

In its operations, Contugas is respectful of territorial diversity. In this regard, we have signed an interagency cooperation agreement with SERNANP.

SDG 17 – Partnership for the goals

Contugas recognizes the relevance of forming alliances to carry out our projects and to achieve our goals. Therefore, we rely on various institutions and entities to manage our initiatives.

- **Corporate Citizenship and Philanthropy
Input**

32. Corporate Citizenship and Philanthropy - Input



Type of Contribution	Total amount (\$)
Cash contributions	0
Time: employee volunteering during paid working hours	1000
In-kind giving: product or services donations, projects/partnerships or similar	1822
Management overheads	1822

- **Lost-Time Injury Frequency Rate (LTIFR)
Employees**

33. Lost-Time Injury Frequency Rate (LTIFR) Employees



LTIFR	Unit	FY 2015	FY 2016	FY 2017	FY 2018
Contractors	n/million work h	0	2.73	2.42	0
Data coverage (as % of contractors, operations or revenues)	Percentage of	65	70	72	73

The Occupational Health and Safety Law 29783 and its regulation DS - 005 - 2012 TR establish that companies carry out periodic audits of the Occupational Health and Safety Management System with members accredited by The Ministry of Labor and Employment Promotion in Peru.

- **Lost-Time Injury Frequency Rate (LTIFR)
Contractors**

34. Lost-Time Injury Frequency Rate (LTIFR) Contractors



LTIFR	Unit	FY 2015	FY 2016	FY 2017	FY 2018
Contractors	n/million work h	2.54	4.55	1.17	0
Data coverage (as % of contractors, operations or revenues)	Percentage of	364	198	414	515

- **CONTUGAS Stakeholders**

35. Stakeholders



Manage a genuine relationship with the Stakeholders is the basis of the Sustainability model of Grupo Energía Bogotá. Spaces for dialogue are carry out constantly to know firsthand their expectations and strengthen the bond with the Stakeholders.

Contugas has determined nine groups from the company's value chain. With them, various mechanisms for dialogue are implemented according to the needs of each one. Mechanisms for dialogue with the interest groups



This corresponds to the translation of the Sustainable Management Report – 2018, pages 22 and 23

35. Stakeholders

Mechanisms for dialogue with the interest groups

This corresponds to the translation of the Sustainable Management Report – 2018, pages 22 and 23



Authorities		
Government (Ministries) Regulatory bodies Regional Government	Letters, telephone communications, email, meetings, management reports	Continuous

Communities		
Education centers Social organizations Neighborhood Council and Neighbors Trade unions	The dialogue is face-to-face and is carried out by the area of Sustainable Development and Community Relationships.	Continuous

Opinion Markers		
Social media Locals Nationals Internationals	The dialogue is circumstantial and through the area of External Communication.	Circumstantial

Suppliers		
Critics and non-critics in: Lima Province Abroad	Face-to-face communication, via email, service order, telephone communications.	Continuous

Subgroups	Mechanisms for dialogue	Frequency of dialogue
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Shareholders and investors

Grupo Energía Bogotá Transportadora de Gas Internacional	Committee meetings, management reports and emails	Continuous
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Clients

Residential Business Industrial	Telephone communications, email, satisfaction surveys, daily and weekly meetings	Continuous
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Partners

Strategic Tactical Operational	Emails, training, talks, meetings, surveys, complaint and claim form	Daily/Weekly
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35. Stakeholders

Prioritization of Stakeholders

PRIORITIZATION OF STAKEHOLDERS

Grupo Energía de Bogotá (GEB) recommended the AA1000 methodology to prioritize Contugas' stakeholders. The following is the score used to classify the stakeholders identified by the company:

- Not important
- Slightly Important
- Moderately important
- Important
- Very important

In this methodology, each manager as well as the members of the External Communication, Community Relations and Sustainable Development areas assign a score according to the following criteria:

Power: This refers to the capacity of the stakeholder to influence the decisions made in each of GEB's companies.

Legitimacy: This refers mainly to the level of social acceptance of the influence and position of the stakeholder with respect to the impacts caused by the companies.

Urgency: This refers to the speed with which one should respond to the influence of the stakeholder.

This corresponds to the translation
of the Sustainable Management
Report – 2016 and 2017

35. Stakeholders

Prioritized Stakeholders

Prioritized Stakeholders

Priority: Shareholders, Government, Authorities, Suppliers, Contractors, Clients and Collaborators

Secondary: Communities, Media and Competitors

Non-Priority: NGOs, Associations and Guilds

Strategic Relationship

Considering its relationship with stakeholders, the company has identified which are the key management offices for building a trust-based relationship with each of them:

General Management: Shareholders.

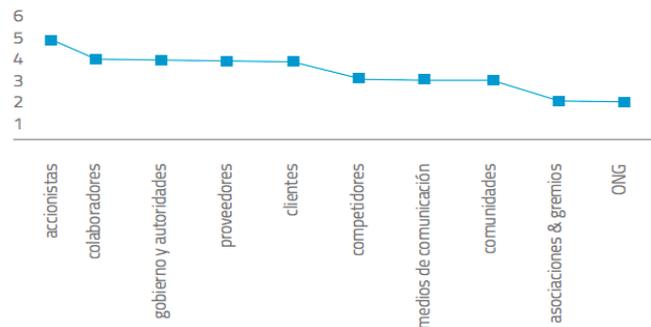
Finance and Administration Management: Suppliers, Contractors and Collaborators.

Operations Management: Suppliers and Contractors.

Legal and Institutional Affairs Management: Government, Authorities and Communities.

Commercial Management: Clients

Matriz priorización grupos de interés - AA 1000



This corresponds to the translation of the Sustainable Management Report – 2016 and 2017

35. Stakeholders

CONTUGAS Stakeholders



Grupos de interés priorizados



This corresponds to the translation of the Sustainable Management Report – 2016 and 2017