

Implementation Report of Best Corporate Practices - Country Code 2025

Country Code Recommendation	Implemented	Date of Implementation	Date of Amendment	Response
1.1. The Company provides equal treatment to all shareholders who, holding the same class of shares, are in the same conditions, without this implying access to privileged information for some shareholders with respect to others.	Yes	November 15, 2001		<p>Equal treatment is a commitment to all our shareholders; therefore, it is enshrined in article 13 of the Company's Bylaws and detailed in paragraph 2 of title 1 of the Code of Good Governance. To ensure the application of this principle, we use the regular channels of communication with shareholders, investors, and the market in general by publishing relevant information reports in the system provided by the Financial Superintendence for this purpose; by replicating Material Information published to the market; through publishing information of interest in the "Investors" and "Corporate Governance" sections on the website; and finally through social media. Another of the mechanisms in place for use by all ISA shareholders is the Shareholder Service Center (managed by Fiduciaria Bancolombia), which is responsible for processing and giving responses to requirements of ISA's shareholders. It is located in Medellín, Carrera 48 No. 26 - 85 Piso 1, Torre Sur, sucursal Puerta del Río. There is also a nationwide shareholder service line: 01 8000 954 242 and a Medellín line: (604) 444 7231, as well as an e-mail address: caa@bancolombia.com.co. ISA also has Correspondence Centers at its headquarters in Medellín, where investors can send written communications to the Company. These communications are sent to the Shareholder Service Center on a daily basis, where they are processed. These communications are free of charge. The corporate website: https://isa.co/en/, Investors section (https://isa.co/en/investors/shareholder-service/) contains the different communication channels and contact information. The corporate documents cited in this response are published on the corporate website: https://isa.co/en/ ISA / Corporate Governance: https://isa.co/en/isa-group/corporate-governance/.</p>
1.2. The Board of Directors has approved a specific procedure that defines the Company's practices to interact with the shareholders of different conditions on affairs such as: access to information, resolution of requests for information, communication channels, and ways of interaction between shareholders and the Company, its Board of Directors and other administrators.	Yes	April 28, 2006	April 28, 2006	<p>The Code of Good Governance adopted by the Board of Directors establishes communication channels dedicated to serve shareholders, through which requests and requirements are addressed. Additionally, the website: https://isa.co/en/ Investors section (https://isa.co/en/investors/) contains everything related to shareholder and investor relations mechanisms. All information related to ISA's corporate governance can be viewed on the corporate website: https://isa.co/en/isa-group/corporate-governance/.</p>

<p>2.1. Through its website, the Company informs the public with clarity, accuracy, and integrity different classes of shares issued by the Company, the number of shares issued for each class, and the number of shares in reserve, as well as the rights and obligations inherent to each class of shares.</p>	<p>Yes</p>	<p>January 30, 2005</p>		<p>On the Company's website: https://isa.co/en/ Investors / Invest In ISA / Company profile, the public is informed about ISA's shareholding structure, the number of shares issued and in reserve, and that all the Company's outstanding shares are ordinary, nominal, and dematerialized. Rights inherent to shares are established in the Corporate Bylaws, in the Code of Corporate Good Governance, and in the Regulations of the Shareholders' Meeting. See https://isa.co/en/investors/company-profile/ All information related to ISA's corporate governance is posted on the corporate website: https://isa.co/en/isa-group/corporate-governance/</p>
<p>3.1. In transactions that may cause dilution of minority shareholders' capital (in the event of a capital increase relinquishing preemptive rights in the subscription of shares, merger, demerger, or segregation, among others), the Company explains them in detail to shareholders in a report of the Board of Directors sent in advance, and with the opinion (about the terms of the transaction) of an independent external advisor of recognized solvency (fairness opinion), appointed by the Board of Directors. These reports are made available to shareholders before the Meeting within the terms for the exercise of the right of inspection.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>December 14, 2018</p>	<p>Paragraph 6 of title I of ISA's Code of Good Governance establishes that transactions that may result in the dilution of minority shareholders' capital shall be explained in advance and in detail to shareholders by means of a report of the Board of Directors, complemented by the opinion of a creditworthy independent external advisor, in which the terms of the transaction shall be analyzed (fairness opinion). The advisor shall be appointed by the Board of Directors. This report and the opinion of the independent advisor shall be available to the shareholders fifteen (15) business days before the Shareholders' Meeting, where the respective transaction will be discussed. Regarding this measure, we inform that, during the reported period, there were no transactions that could result in the dilution of minority shareholders' capital. All information related to ISA's corporate governance is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/</p>

<p>4.1. The Company has a corporate website, in Spanish and English, with a Corporate Governance link or a link to the relationship with shareholders and investors, or its equivalents, including financial and non-financial information under the terms proposed in Recommendations 32.3 and 33.3 and that, in no case, may include confidential information of the Company or information related to industrial secrets, or information which disclosure could be used to harm Company.</p>	<p>Yes</p>	<p>January 1, 2004</p>		<p>ISA has a corporate website: www.isa.co, which ISA section (https://isa.co/en/), Investors section (https://isa.co/en/investors/), Corporate Governance section (https://isa.co/en/isa-group/corporate-governance/) and Sustainable Value section (https://isa.co/en/sustainable-value/) contain the financial and non-financial information referred to in Recommendations 32.2 and 33.3. The website is available in Spanish and English.</p>
<p>4.2. The Company has mechanisms for permanent access and exclusive use of shareholders, such as a website link for exclusive access of shareholders, or an attention or relations office for shareholders and investors, regular information meetings, among others, so that they can express their opinions or raise concerns or suggestions about the development of the Company and those associated with their status as shareholders.</p>	<p>Yes</p>	<p>June 1, 2007</p>		<p>ISA has various communication channels aimed exclusively at investors. One of them is the Shareholder Service Center (managed by Fiduciaria Bancolombia), which is responsible for attending to and solving the requirements of ISA's shareholders, located in Medellín at Carrera 48 No. 26 - 85 Piso 1, Torre Sur, sucursal Puerta del Río. There is also a nationwide shareholder service line: 01 8000 954 242 and a Medellín line: (604) 444 7231, as well as an e-mail address: caa@bancolombia.com.co. ISA also has Correspondence Centers at its main headquarters in Medellín, where investors can send written communications to the Company, which are forwarded to the Shareholder Service Center for attention. These communications are free of charge. The corporate website: https://isa.co/en/, Investors section (https://isa.co/en/investors/shareholder-service/) contains the different communication channels and contact information.</p>

<p>4.3. The Company organizes events to present quarterly results to its shareholders and market analysts. These presentations may be face-to-face or remote (conference, videoconference, etc.).</p>	<p>Yes</p>	<p>January 30, 2007</p>		<p>In 2025, ISA held meetings with individuals, local and international investment funds, and institutional investors. ISA held quarterly results presentation conferences in Spanish with simultaneous interpretation into English. The documents and information presented at the results conferences, along with other presentations, financial reports, General Shareholders' Meeting, relevant information, news, etc. are published on the corporate website: https://isa.co/en/, Investors section (https://isa.co/en/investors/financial-information/). The events held in 2025 were:</p> <ul style="list-style-type: none"> Investor Day (In-Person) Trii Talks (Virtual) Trii 2025 Energy, Infrastructure and Construction Forum (Virtual) Trii Issuer Week (Virtual) Participation in Events with International Investors (In Person) Conference Call and Quarterly Earnings Report to the Market (https://isa.co/en/investors/financial-information/) Period – Publication Date of ISA Report and Results Conference Call 4Q24 – February 26, 2025 1Q25 – May 6, 2025 2Q25 – August 6, 2025 3Q25 – November 5, 2025.
<p>4.4. The Company organizes or participates in fixed-income presentations, events, or forums mainly intended for investors in debt securities and market analysts, where issuer's business indicators, liability management, financial policy, ratings, issuer's performance with respect to covenants, etc. are updated.</p>	<p>Yes</p>	<p>January 30, 2007</p>		<p>ISA participates in meetings with fixed-income and/or variable-income investors at events, in one-on-one meetings, or in group settings.</p> <p>The information shared is public information that includes, among other things, business indicators, financial performance, liability management, financial policy, credit ratings, and other relevant public data.</p> <p>During 2025, ISA organized and/or participated in the following events:</p> <ul style="list-style-type: none"> 2025 Emerging Markets Corporate Conference - BoFA, United States - May 28–30, 2025: One-on-one meetings with institutional investors

<p>4.5. The Corporate Bylaws of the Company establish that a shareholder or group of shareholders representing at least five per cent (5%) of the capital stock may request Specialized Audits on matters other than those audited by the Company's Statutory Auditor. Depending on its capital structure, the Company may determine a percentage below five percent (5%).</p>	<p>Yes</p>	<p>March 18, 2002</p>		<p>Article 47 of the Corporate Bylaws contemplates the possibility that a number of shareholders representing at least 5% of the subscribed shares, or a number of investors whose investment is equal to or greater than 5% of ISA's market capitalization at the time of the request, may request specialized audits to the Board of Directors. No such requests were made during the period being evaluated. All information related to ISA's corporate governance is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/</p>
<p>4.6. For exercising this right, the Company has a written procedure in place, with the specifications required by Recommendation 4.6.</p>	<p>Yes</p>	<p>March 18, 2002</p>		<p>Article 47 of ISA's Corporate Bylaws and paragraph 7.7 of title 4 of the Code of Good Corporate Governance establish the procedure for requesting specialized audits pursuant to the provisions of Recommendation 4.6. The Bylaws and the Code of Good Corporate Governance are published on the corporate website https://isa.co/en/isa-group/corporate-governance/</p>
<p>5.1. The members of the Board of Directors and Senior Management have expressly agreed in their Acceptance Letters or contracts, that after acknowledging the submission of an OPA (takeover bid) or other significant transactions, such as mergers or demergers, there shall be periods during which they undertake not to negotiate (directly or indirectly through an intermediary) company's shares.</p>	<p>Yes</p>	<p>December 14, 2018</p>		<p>In their Appointment Acceptance Letters, the Board members expressly agreed with the rules of the Code of Good Corporate Governance. Similarly, Senior Management members agreed with the rules of the Code of Good Corporate Governance in their employment contracts. In this regard, paragraph 4 of title 6 of ISA's Code of Good Governance expressly establishes that administrators and employees are not allowed to purchase or sell directly or indirectly through an intermediary, shares of the Company from the moment they become aware that relevant operations, such as an OPA (takeover bid), mergers, or demergers are being carried out until the operation has been completed and the closing of the operation has been revealed to the market as relevant information. Likewise, the Corporate Governance Report presented at the Shareholders' Meeting acknowledges the signing of this letter and compliance with this commitment in the paragraph containing the Board of Directors' appointments. The Corporate Governance Report is part of ISA's corporate governance-related information, which is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/ view Download Center - Corporate Governance Report</p>

<p>6.1. Notwithstanding the independence of each individual company within the Group and the responsibilities of its governing bodies, there is an organizational structure for the Group that defines, for the three (3) levels of governance - Shareholders' Meeting, Board of Directors, and Senior Management - the key individual bodies and positions, as well as the relationships between them. This structure is public, clear, and transparent, and allows for the determination of clear lines of responsibility and communication, facilitating the strategic orientation, supervision, control, and effective administration of the Group.</p>	<p>Yes</p>	<p>January 30, 2010</p>	<p>March 29, 2019</p>	<p>According to article 5 of the Corporate Bylaws, ISA is part of the business group whose parent company is Ecopetrol S.A. ISA is in charge of the strategic organization, supervision, and coordination of the companies in which it has a direct or indirect majority shareholding and in companies in which it has the capacity to influence management decisions by disseminating or implementing, as the case may be, the general policies, strategies, guidelines, and instructions of the parent company of the Group, taking into account the characteristics and singularities of the countries and/or businesses in which such companies participate. Under these guidelines, policies and procedures are adopted that define the responsibilities of the three (3) levels of governance and the individual bodies and positions, which are found in the Code of Good Corporate Governance, titles 2 and 3, and on ISA and its companies' intranet, which are also communicated in the ISA and its Companies' Committee. The implementation of the policies and procedures adopted by the Board of Directors and its committees in the different companies is the responsibility of Senior Management (key individual bodies and positions). ISA's organizational chart can be found at: https://isa.co/en/isa-group/isa-talent/. All information related to ISA's corporate governance is posted on the corporate website: https://isa.co/en/isa-group/corporate-governance/</p>
<p>6.2. The Parent Company and its most important Subordinate Companies have defined a reference framework for institutional relations by means of a public agreement, approved by the Board of Directors of each of these companies, which regulates matters indicated in Recommendation 6.2.</p>	<p>No</p>			<p>ISA is part of the business group whose parent company is Ecopetrol S.A. Article 5 of ISA's Corporate Bylaws establishes ISA's role within the business group, which is: to be in charge of the organization, supervision, and strategic coordination of the companies in which it is a direct or indirect majority shareholder and those in which it has the capacity to influence management decisions by disseminating or implementing, as the case may be, the policies, strategies, guidelines, and general directives of the corporate group's parent company, taking into account the characteristics and singularities of the countries and/or businesses in which such companies participate. Ecopetrol has established a Corporate Governance Model for the group that defines the framework governing the relationships among the group's companies. In addition, ISA has defined a Relationship Model between ISA and its Companies, which seeks to ensure unity of purpose and direction in accordance with ISA's role within the Ecopetrol group, and is implemented through a series of interaction topics and mechanisms, definitions, and standardized practices that are formalized in specific corporate documents and expressed as guidelines covering strategic, tactical, and operational aspects. Among the key elements of the Relationship Model are the higher purpose and guiding principles of the manifesto, the corporate strategy, the framework for action (Code of Good Governance, Code of Ethics and Conduct, Commitments to Stakeholders), bylaws, general shareholders' meeting decisions, resolutions of the Board of Directors and the Executive Committee, and internal work regulations. In addition, other elements are defined that allow us to take a look at what unites us as a group, such as corporate policies or decisions guiding our management. Each of the above elements have scope for ISA and its companies, are public, and have been approved in ISA and incorporated in each of the companies by the corresponding governing bodies. Information regarding ISA's corporate governance is available on the company's website https://isa.co/en/isa-group/corporate-governance/</p>

<p>7.1. Except for those disputes between shareholders, or between shareholders and the Company or its Board of Directors that by express legal mandate should necessarily be brought before the ordinary courts, the Company's Bylaws include mechanisms for the resolution of disputes, such as: direct agreement, amicable resolution, conciliation, or arbitration.</p>	<p>Yes</p>	<p>June 25, 2003</p>	<p>March 27, 2006</p>	<p>Article 15 of the Corporate Bylaws establishes alternative mechanisms for conflict resolution, as established in Recommendation 7.1. The Corporate Bylaws and all information related to ISA's corporate governance is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/</p>
<p>8.1. Besides other functions assigned to the General Shareholders' Meeting according to the legal framework, the Bylaws expressly define the functions of the General Shareholders' Meeting referred to in Recommendation 8.1. and emphasize their exclusive, non-transferrable nature.</p>	<p>Yes</p>	<p>March 31, 2011</p>	<p>March 27, 2015</p>	<p>Article 26 of the Corporate Bylaws defines the functions indicated in Recommendation 8.1. The statutory powers of the Meeting are exclusive responsibility of this corporate body. These powers could only be assigned to other corporate body through a statutory reform. The Corporate Bylaws and the information related to ISA's corporate governance is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/</p>

<p>9.1. The Company has the Functioning Regulations of the General Shareholders' Meeting, which regulates all matters relevant to the Meeting, including calls to the Meeting; preparation of the information to be received by shareholders; and support, development, and exercise of shareholders' political rights in such a way that they are perfectly informed of all the development scheme of the Meeting.</p>	<p>Yes</p>	<p>January 15, 2001</p>	<p>September 20, 2019</p>	<p>ISA's General Shareholders' Meeting has internal regulations in place for all matters related to it, approved by Resolution of the Board of Directors. Likewise, the matters referred to in Recommendation 9.1 are established in the Code of Corporate Good Governance, which also incorporates the Functioning Regulations of the General Shareholders' Meeting. To see how these rules were complied with at each year's shareholders' meeting, please refer to the Shareholders' Meeting chapter of the Corporate Governance Report submitted to the Shareholders' Meeting. All information related to ISA's corporate governance is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/ see Download Center - Corporate Governance Report</p>
<p>10.1. To facilitate the exercise of shareholders' right to information, the Corporate Bylaws establish that the Ordinary General Shareholders' Meeting should be convened not less than thirty (30) calendar days in advance, and extraordinary meetings should be convened not less than fifteen (15) calendar days in advance. The foregoing is without prejudice to the legal terms established for corporate reorganizations (e.g., merger, demerger, or transformation).</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>ISA's Corporate Bylaws (article 19 and article 21) establish the procedure to call ordinary and extraordinary meetings, within the deadlines set out in the Recommendation. The foregoing is also included in the Functioning Regulations of the General Shareholders' Meeting. The General Shareholders' Meeting for the 2025 period was convened pursuant to the Company's Bylaws. To consult the date of the notice of call, please refer to the Corporate Governance Report for the 2025 period and the Minutes of the 2025 Shareholders' Meeting, available at: https://isa.co/en/isa-group/general-shareholders-meeting/</p>

<p>10.2. In addition to the traditional and mandatory channels provided for by law, the Company ensures full disclosure and publicity of the notice of call by using technology, such as the corporate website, personalized email alerts and, if deemed appropriate, social media.</p>	<p>Yes</p>	<p>November 25, 2005</p>		<p>Pursuant to paragraph 2 of title 2 of ISA's Code of Good Governance, in addition to the traditional and mandatory channels provided for by law to summon a Meeting, ISA publishes on its corporate website: https://isa.co/en/, all the notices of call for both Ordinary and Extraordinary Shareholders' Meetings. Under the path ISA/Corporate Governance/General Shareholders' Meeting, visitors can find the notices of call for the most recent General Shareholders' Meetings held at ISA. In addition, messages are sent by e-mail to shareholders and posted on social media. The call notices for each meeting are published on the website on the same date as the press releases. The minutes of the shareholders' meeting held on March 26, 2025 (ordinary meeting) keeps record of the manner in which the respective notice of call was issued. See: https://isa.co/en/isa-group/general-shareholders-meeting/</p>
<p>10.3. To improve transparency in the decision-making process during the General Shareholders' Meeting, in addition to the meeting Agenda with a point-by-point list of the items to be discussed, the Company has provided that, simultaneously with the summons or at least fifteen (15) calendar days prior to the Meeting, the Proposals to be submitted by the Board of Directors to the General Shareholders' Meeting for each item on the Agenda shall be made available to shareholders.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 19 of the Corporate Bylaws and article 4 of the Functioning Regulations of the General Shareholders' Meeting contemplate the provisions of Recommendation 10.3. ISA's website has an exclusive section where all the information related to the General Shareholders' Meeting is published. There, shareholders can consult the Agenda of the meeting and all the Proposals to be submitted for consideration at the Shareholders' Meeting. For more information, please visit: www.isa.co in the ISA/Corporate Governance/Shareholders' Meeting section. To access the information on the General Shareholders' Meetings for the 2025 period, please refer to the Shareholders' Meetings chapter of the Corporate Governance Report 2025. See: https://isa.co/en/isa-group/general-shareholders-meeting/</p>
<p>10.4. Any improper spin-off can only be analyzed and approved by the General Shareholders' Meeting when this item has been expressly included in the notice of call of the respective meeting.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 21 of the Corporate Bylaws provides that the notice of call shall meet the requirements of articles 13 and 67 of Law 222 of 1995 or the rules that modify, complement, or replace it, when all types of demerger projects are to be discussed at the Meeting, without distinction. In this regard, we inform that during the reported period no improper spin-off proposals were presented to the General Shareholders' Meeting. The Corporate Bylaws and the information related to ISA's corporate governance is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/</p>

<p>10.5. The Agenda proposed by the Board of Directors accurately contains all items to be discussed, so as to prevent important items from being hidden or masked by vague, generic, overly general, or broad terms such as “other” or “proposals and miscellaneous.”</p>	<p>Yes</p>	<p>March 1, 2015</p>		<p>Paragraph 3 of title 2 of the Code of Good Governance provides that the Agenda items shall be expressed in a clear, precise manner to facilitate understanding and analysis by shareholders. Article 5 of the Internal Regulations of the General Shareholders' Meeting regulate the Agenda and establish that the notice of call shall include the Agenda of the Meeting, specifying point by point all the items that will be discussed. The item "Miscellaneous or proposals from shareholders" included in the Agenda of the General Shareholders' Meeting of 2025 was included for the sole purpose of allowing shareholders to make comments and raise their concerns to the administrators. This can be verified in the Meeting's Minutes. In this regard, we also inform that the ISA website has an exclusive section to publish all the information related to the General Shareholders' Meeting. There, shareholders can consult the Agenda and all the proposals that will be submitted for consideration at the Shareholders' Meeting. They are published in a clear, precise manner to facilitate understanding. For information about the 2025 period, please visit: https://isa.co/en/, ISA / Corporate Governance / Shareholders' Meeting / Shareholders' Meetings History. https://isa.co/en/isa-group/general-shareholders-meeting/</p>
<p>10.6. In the case of amendments to the Bylaws, each article or group of articles that are substantially independent shall be voted on separately. In any case, an article is voted on separately if any shareholder or group of shareholders representing at least five percent (5%) of the share capital so requests during the Meeting. This right is previously informed to shareholders.</p>	<p>Yes</p>	<p>September 25, 2015</p>		<p>Article 5 of the Internal Regulations of the General Shareholders' Meeting includes the provisions of Recommendation 10.6 In 2024, no amendments to the Bylaws were submitted for consideration by the General Shareholders' Meeting. Information on meeting held in 2025 can be consult in the Ordinary Shareholders' Meeting history section: https://isa.co/en/isa-group/general-shareholders-meeting/. Likewise, the Functioning Regulations of the General Shareholders' Meeting can be consulted at: https://isa.co/en/isa-group/general-shareholders-meeting/</p>
<p>10.7. Without prejudice to the provisions of article 182 of the Code of Commerce, to strengthen and guarantee shareholders' right of inspection and information prior to the Meeting, the Bylaws recognize shareholders' right, regardless of the size of their stake, to propose the introduction of one or more items to discuss in the Agenda of the General Shareholders' Meeting, within a reasonable limit, provided that the request for the new items is justified. Shareholders shall submit their requests within five (5) calendar days of the publication of the notice of call.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 19 of the corporate Bylaws, paragraph 4 of title 2 of the Code of Good Governance and article 5 of the Functioning Regulations of the General Shareholders' Meeting establish the provisions of Recommendation 10.7. At the 2025 Annual Shareholders' Meeting, some shareholders submitted requests to add new items to the agenda. These requests were reviewed by the Board of Directors, which responded in writing to the shareholders' requests, indicating that these items would be addressed under the relevant agenda items listed in the meeting notice. In line with this, at the Ordinary Shareholders' Meeting, the board addressed each of the matters raised by the shareholders, as recorded in Minutes No. 120 dated March 26, 2025. All information related to ISA's corporate governance is published on the corporate website https://isa.co/en/isa-group/corporate-governance/, as is information about the General Meeting https://isa.co/en/isa-group/general-shareholders-meeting/ See the "General Shareholders' Meeting History" section - Minutes No. 120 of the General Shareholders' Meeting</p>

<p>10.8. If the request is dismissed by the Board of Directors, the latter is obliged to reply in writing those requests that are supported, at least a percentage of five per cent (5%) of the share capital, or a lower percentage established by the Company according to the degree of ownership, explaining the reasons that motivate its decision and informing shareholders about the right they have to raise their proposals during the Meeting according to the provisions of Article 182 of the Code of Commerce.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 19 of the Corporate Bylaws, paragraph 4 of title 2 of the Code of Good Governance, and article 5 of the Functioning Regulations of the General Shareholders' Meeting establish the provisions of Recommendation 10.8. At the 2025 Annual Shareholders' Meeting, some shareholders submitted requests to add new items to the agenda. These requests were reviewed by the Board of Directors, which responded in writing to the shareholders' requests, explaining the rationale for its decision and indicating that these items would be addressed at the meeting under the agenda items listed in the notice of the meeting. This response was disclosed as material information for the attention of all shareholders and published on the company's website. In line with the foregoing, at the Ordinary Shareholders' Meeting, the board addressed each of the matters raised by the shareholders, as recorded in Minutes No. 120 dated March 26, 2025. This can be verified at the following links: https://isa.co/en/isa-group/corporate-governance/ Download center https://isa.co/en/isa-group/general-shareholders-meeting/ See Minutes No. 120 of the General Shareholders' Meeting. Response from the Board of Directors: https://isa.co/en/informacion/response-to-requests-for-inclusion-of-items-on-the-agenda-of-the-ordinary-meeting-of-the-isa-general-shareholders-meeting-in-accordance-with-the-provisions-of-article-19-of-the-articles-of-associat/</p>
<p>10.9. In the event that the Board of Directors accepts the request, after the time for the shareholders to propose items has elapsed, a complement to the call of the General Shareholders' Meeting will be published, at least fifteen (15) calendar days prior to the Meeting.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 19 of the Corporate Bylaws, paragraph 4 of title 2 of the Code of Good Governance, and article 5 of the Functioning Regulations of the General Shareholders' Meeting establish the provisions of Recommendation 10.9. At the 2025 Annual Shareholders' Meeting, some shareholders submitted requests to add new items to the agenda; however, there was no need to publish a supplement to the notice of the meeting based on the Board of Directors' response to the shareholders' requests, which was also disclosed as relevant information. This can be verified at the following links: https://isa.co/en/isa-group/general-shareholders-meeting/ https://isa.co/en/isa-group/corporate-governance/ https://isa.co/en/informacion/response-to-requests-for-inclusion-of-items-on-the-agenda-of-the-ordinary-meeting-of-the-isa-general-shareholders-meeting-in-accordance-with-the-provisions-of-article-19-of-the-articles-of-associat/</p>
<p>10.10. Within the same deadline referred to in Recommendation 10.7., shareholders may also submit, with supporting documentation, new Agreement Proposals on issues already previously included in the Agenda. For these requests, the Board of Directors acts according to provisions of Recommendations 10.8 and 10.9.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 19 of the Corporate Bylaws, paragraph 4 of title 2 of the Code of Good Governance, and article 5 of the Functioning Regulations of the Ordinary General Shareholders' Meeting establish the provisions of Recommendation 10.10. At the 2024 Ordinary General Shareholders' Meeting, no shareholder submitted Agreement Proposals on the Agenda. All information related to ISA's corporate governance is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/ https://isa.co/en/isa-group/general-shareholders-meeting/ See General Shareholders' Meeting History section</p>

<p>10.11. The Company is required to use electronic means of communication, mainly the corporate website with exclusive access for shareholders, to make available to them these documents and the information on each of the items of the Agenda.</p>	<p>Yes</p>	<p>January 30, 2015</p>	<p>February 11, 2021</p>	<p>The documents and information related to each of the items on the Agenda are available to shareholders and the general public at: www.isa.co, ISA/General Shareholders' Meeting, as well as in the Corporate Reports tab of the same section. Similarly, information is made available to all shareholders and investors through the Investor Relations microsite. In said microsite, in the ISA / Shareholder service section, there is an exclusive channel for shareholders, who shall enter their identification information to access tax statements and certificates. Information on the Shareholders' Meeting: https://isa.co/en/isa-group/general-shareholders-meeting/. Corporate Governance Information: https://isa.co/en/isa-group/corporate-governance/. Shareholder Service: https://isa.co/en/investors/shareholder-service/. Other channels are also used to publish the Agenda of the Meeting, such as press notices published in the main national newspapers in advance.</p>
<p>10.12. The Company's Bylaws recognize the right of shareholders to request in advance information or clarifications that they deem relevant through traditional channels and/or, where appropriate, new technologies, or to write down the questions that they deem necessary in relation to the matters discussed in the Agenda, the documentation received, or the public information provided by the Company. Depending on the deadline established by the Company for summoning the General Shareholders' Meeting, the Company determines the period within which shareholders may exercise this right.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 14 of the Corporate Bylaws and paragraph 3 of title 2 of the Code of Good Governance set forth the provisions of Recommendation 10.12. Shareholder requests are reported in the Shareholders' Meeting chapter of the Corporate Governance Report available on the website: https://isa.co/en/isa-group/general-shareholders-meeting/ See Download Center - Corporate Governance Report. All information related to ISA's corporate governance is published on the corporate website: : https://isa.co/en/isa-group/corporate-governance/</p>

<p>10.13. The Company has established that the requested information may be denied if, according to the internal procedures, it may be deemed: i) unreasonable; (ii) irrelevant to know the Company's course or interests; (iii) confidential, which will include privileged information in the field of market values, industrial secrets, transactions in progress which good ending for the Company substantially depend on their confidentiality; and (iv) others which disclosure would imminently endanger and put at serious risk its competitiveness.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 14 of the Corporate Bylaws and paragraph 3 of title 2 of the Code of Good Governance set forth the provisions of Recommendation 10.13. All information related to the Shareholders' Meeting is published on the website and on the Financial Superintendence's relevant information system. All information related to ISA's corporate governance is published on the corporate website: https://isa.co/en/isa-group/corporate-governance/ https://isa.co/en/isa-group/general-shareholders-meeting/ See General Shareholders' Meeting History. https://isa.co/en/investors/relevant-information-news/</p>
<p>10.14. When the response given to a shareholder could give them an advantage, the Company guarantees access to that response to the other shareholders according to the mechanisms established for that purpose and under the same conditions.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 14 of the Corporate Bylaws and paragraph 3 of title 2 of the Code of Good Governance set forth the provisions of Recommendation 10.14. All information related to the Shareholders' Meeting is published on the website and on the Financial Superintendence's relevant information system. Regarding the agenda for the 2025 Annual Shareholders' Meeting, the company disclosed, as relevant information, the Board of Directors' response to requests from certain shareholders regarding changes to the agenda for that meeting. This can be verified at the following links: https://isa.co/en/isa-group/corporate-governance/ Download center https://isa.co/en/isa-group/general-shareholders-meeting/ See General Shareholders' Meeting History https://isa.co/en/informacion/response-to-requests-for-inclusion-of-items-on-the-agenda-of-the-ordinary-meeting-of-the-isa-general-shareholders-meeting-in-accordance-with-the-provisions-of-article-19-of-the-articles-of-associat/</p>
<p>11.1. Notwithstanding the limitations set forth in article 185 of the Code of Commerce, External Circular Letter 24 of 2010, and any regulations that modify, supplement, or replace them, the Company does not limit the right of shareholders to be represented at the General Shareholders' Meeting, and shareholders may delegate their vote to any person, whether or not that person is a shareholder.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 14 of the Corporate Bylaws, article 8 of the Functioning Regulations of the General Shareholders' Meeting, and paragraph 1 of title 1 of the Code of Good Governance establish the right of shareholders to be represented without preventing their vote from being delegated. On the ISA website, in the Shareholders' Meeting section https://isa.co/en/isa-group/general-shareholders-meeting/ See General Shareholders' Meeting History section. Likewise, all information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>11.2. The Company minimizes the use of delegated blank votes without voting instructions, thus actively promoting the use of a standard representation letter template provided by the Company to the shareholders, or published on its website. The template includes the items of the Agenda and the corresponding Agreement Proposals defined under the procedure previously established and that will be subject to the consideration of shareholders, so the shareholder (if they deem it appropriate) can indicate the sense of their vote to their representative.</p>	<p>Yes</p>	<p>August 25, 2015</p>		<p>Article 8 of the Functioning Regulations of the General Shareholders' Meeting establishes that a proxy template that can be used by shareholders for the meetings will be published on the website. On the corporate website, ISA/General Shareholders' Meeting/ Download Center, several proxy templates are available (natural person and legal entity) that are updated with the Agenda of each meeting and the Agreement Proposals, clearly and in detail https://isa.co/en/isa-group/general-shareholders-meeting/. Likewise, all the information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>12.1. With the aim of strengthening the role of the General Shareholders' Meeting in the consolidation of the corporate will, making it a much more participatory body, the Regulations of the Shareholders' Meeting require that the members of the Board of Directors and, especially, the Chairmans of the Board of Directors Committees, as well as the Company's CEO, attend to the Meeting to respond to the shareholders' concerns.</p>	<p>Yes</p>	<p>January 29, 2016</p>		<p>Paragraph 7 of title 2 of ISA's Code of Good Governance states that the members of the Board of Directors and the CEO of the Company shall attend the Meeting to address shareholders' concerns. The CEO of the Company and most of the members of the Board of Directors attended the Ordinary General Shareholders' of 2025. The Code of Good Governance can be found at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>13.1. The Bylaws expressly state the functions that may not be delegated to Senior Management, which include those set forth in Recommendation 13.1.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 34 of the Corporate Bylaws establishes the duties of the Company's Board of Directors. Such duties shall not be delegated, including those set forth in Recommendation 13.1. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>13.2. Without prejudice to the autonomy of the governing bodies of the Subordinate Companies, when the Company acts as a parent company of a Group or, such functions of the Board of Directors have a group approach and are developed through general policies, guidelines, or requests for information that respect the balance between the interests of the Parent Company and the Subordinate Companies, and the Group as a whole.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>March 25, 2022</p>	<p>Article 34 of the Corporate Bylaws, Paragraphs 1 and 2, establishes that the Board of Directors has the following duties: 1) Within the framework determined by the strategy and general guidelines of the parent company establish, guide, supervise, and review the strategy, guidelines, policies, and the organizational, technical, financial, investment guidelines as well as other management aspects required for achieving ISA's business objectives as well as the ones of the companies in which ISA is a direct or indirect majority shareholder or can influence management decisions, thus contributing to their integration into the group's governance model and its business plan. 2) Define ISA's and its companies' structure and relationship model, within the framework of the Group's governance model. These functions were modified in the Bylaws reform approved by the General Shareholders' Meeting in 2022, as a consequence of ECOPETROL's purchase of 51.4% of ISA and its entry into the Group. The Corporate Bylaws can be found at: https://isaasprods-d87a26cb809c1f43d1f1-endpoint.azureedge.net/blobisaasprods27f2ae9b77/wp-content/uploads/2022/05/2022-ESTATUTOS-INGLE%CC%81S.pdf</p>
<p>14.1. The Board of Directors has approved the internal regulation governing its organization and operation, as well as the roles and responsibilities of its members, the Chairman and the Secretary of the Board of Directors, and their duties and rights. This internal regulation is made available to shareholders, and it has a binding nature on the members of the Board of Directors.</p>	<p>Yes</p>	<p>May 29, 2009</p>	<p>June 19, 2025</p>	<p>The ISA Board of Directors, by Resolution 138 of 2025, approved the update to its Operating Regulations. These Regulations are published on the corporate website https://isaasprods-d87a26cb809c1f43d1f1-endpoint.azureedge.net/blobisaasprods27f2ae9b77/wp-content/uploads/2025/09/agreement-138-regulations-of-the-board-of-directors-19062025.pdf</p>
<p>15.1. The Company has statutorily chosen not to appoint Alternate Members of the Board of Directors.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Article 27 of ISA's Corporate Bylaws establishes that the Company's Board of Directors shall be composed of nine members, without alternates. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>16.1. Based on the premise that, once elected, all members of the Board of Directors act seeking the benefit of the Company, in an exercise of highest transparency, the Company identifies the origin of the various members of the Board of Directors according to the scheme defined in Recommendation 16.1.</p>	<p>Yes</p>	<p>January 30, 2010</p>	<p>January 29, 2016</p>	<p>Paragraph 2 of title 3 of ISA's Code of Good Governance establishes the procedure to form the Board of Directors, which establishes that no employee of the Company may be a member of the Board of Directors. Therefore, the Company has no Executive Members on the Board of Directors, and a procedure for the appointment of such members is established. Likewise, on the corporate website: www.isa.co, ISA Group/ Corporate Governance/ Board of Directors, the names of all the members of the Board, specifying their origin, can be found. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>16.2. The Company has a procedure in place, structured through the Appointments and Remunerations Committee or any other that performs its functions, which allows the Board of Directors, through its own dynamics and the conclusions of the annual assessments, to achieve the objectives set out in the Recommendation 16.2.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>Paragraph 2 of title 3 of ISA's Code of Good Governance establishes the procedure for the conformation of ISA's Board of Directors, which is in charge of the Corporate Governance, Sustainability, Technology, and Innovation Committee, which has the functions established in this Recommendation for the Appointments and Remunerations Committee. This Committee has among its functions, established in Agreement 140 of 2025: to propose the succession policy for the Board of Directors that is approved at the Meeting, to evaluate the suitability of candidates for Board members, and to inform the Board of Directors of those cases in which a Board member may affect the proper functioning of the Board or the reputation of the Company. As proof of the application of Recommendation 16.2, information about the Board of Directors' evaluation processes, as well as a summary of the results, can be found in the Corporate Governance Report for the corresponding year. Prior to the election of the members of the Board of Directors by the Ordinary General Shareholders' Meeting of March 26, 2025, the Corporate Governance, Sustainability, Technology, and Innovation Committee evaluated the suitability of the candidates based on statutory requirements and the Board of Directors' Succession Policy. In the minutes of the respective meetings, the above can be verified at: https://isa.co/en/isa-group/general-shareholders-meeting/. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>16.3. The professional profiles considered necessary are reported by the Board of Directors to the shareholders, so that the different stakeholders, who are mainly controlling and significant shareholders, families, groups of shareholders, and institutional shareholders (if they exist), and the Board of Directors itself, can identify the most suitable candidates.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>March 25, 2022</p>	<p>The Board of Directors Succession Policy approved by the General Shareholders' Meeting indicates the knowledge and experience required of the members of ISA's Board of Directors and that a reasonable balance and diversity should be taken into account when nominating candidates for the Board. The Board of Directors' succession policy is available on the corporate website: https://isa.co/en/ ISA / Corporate Governance / Board of Directors. All information related to the Board of Directors, the Bylaws, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>16.4. The Company considers that the evaluation of shareholders' resumés is an insufficient resource to determine the suitability of candidates, so it has an internal procedure in place to assess legal incompatibilities and disqualifications and the suitability of the candidate according to the needs of the Board of Directors. The procedure evaluates a set of criteria to be met by the professional and personal profiles of the candidates, and verifies whether they meet specific requirements to be member of the Board of Directors and others necessary to be an Independent Member.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>Pursuant to paragraph 2 of title 3 of ISA's Code of Good Governance and Agreement 140 of 2025 of the Board of Directors, which establishes the Functioning Regulations of the Corporate Governance, Sustainability, Technology, and Innovation Committee (GSTI Committee), ISA has a procedure in place whereby said Committee evaluates the suitability of the board candidates proposed by the shareholders, based on Board's Succession Policy and the legal and statutory requirements. The Committee verifies that the proposed candidates: (i) are not subject to any grounds of disqualification, incompatibility, or prohibition to hold office; (ii) meet the minimum requirements established in the Bylaws for members of the Board of Directors; (iii) their appointment does not adversely affect the functioning of the Board of Directors or the reputation of the Company; (iii) are not involved in a permanent conflict of interest with respect to the Company's operations as a whole; (iv) have an independent status; and (v) comply with the Succession Policy of the Board of Directors. The Code of Good Governance, the Board's Succession Policy, and Agreement 140 are published on the corporate website: https://isa.co/en/, under ISA Group/ Corporate Governance/ Download Center. Prior to such verification by the GSTI Committee, the candidates must fill out an application form and a resume template provided by the Company, in which they declare whether they meet the requirements to be a Board member, whether or not they are involved in any cause of disqualification or incompatibility, or whether they have a regulatory or statutory impediment to become a member of the Board of Directors. Likewise, they must declare whether or not they are involved in a permanent conflict of interest regarding the Company's operations as a whole, and they must provide the additional information required by the Company to verify the qualities of the nominees and any sources of potential conflicts of interest. If they are nominated as independent members, they must also state that they comply with the independence requirements pursuant to paragraph 2 of article 44 of Law 964 of 2005 as supplemented, modified or replaced, as well as the requirements set forth in the Corporate Bylaws. Prior to their election at the Shareholders' Meeting of March 26, 2025, the Corporate Governance, Sustainability, Technology, and Innovation Committee evaluated each of the candidates proposed by the shareholders, in accordance with the corporate governance framework. The minutes of the meetings are available at: https://isa.co/en/isa-group/general-shareholders-meeting/. Likewise, the Corporate Governance Report evidences the implementation of this procedure. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
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<p>16.5. In addition to independence requirements provided for in Law 964 of 2005, the Company has voluntarily adopted a more rigorous definition of independence than that established in the aforementioned law. This definition has been adopted as a reference framework through its Board of Directors Regulation and includes, among other requirements that should be evaluated, relationships or links of any kind between the independent member candidate and significant or controlling shareholders and their related parties, national and foreign, and requires a double Declaration of Independence: (i) of the candidate before the Company, its shareholders and Senior Management's members, formalized through their Acceptance Letter and, (ii) of the Board of Directors with respect to the independence of the candidate.</p>	<p>Yes</p>	<p>March 23, 2018</p>		<p>Article 27 of ISA's Corporate Bylaws includes the legal criteria of independence established in Law 964 of 2005 and contains additional criteria: the category of close relatives was included in each independence criterion; also, a new paragraph was incorporated regarding situations that may arise with the statutory auditors. These criteria tighten the requirements to be considered as an independent member of ISA. Similarly, Article 6 of the Board of Directors' Operating Regulations states that "Candidates nominated to be included on the list or lists of Board of Directors members must accept such nomination in writing, stating that they meet the requirements to be a member of the Board, that they are not subject to any grounds for disqualification or incompatibility, that there are no regulatory impediments to their serving on the Board of Directors, and that they are not in a situation of permanent conflict of interest with respect to the Company's operations as a whole. If they are nominated as independent members, they shall also state that they comply with the independence requirements pursuant to paragraph 2 of article 44 of Law 964 of 2005 or the rules that modify, add or replace it and those established in the bylaws." These statements are part of the nomination form mentioned in the response to Measure 16.4, and the Corporate Governance Report of the Meeting reports on this action. The Board of Directors, through the Corporate Governance, Sustainability, Technology and Innovation Committee, reviews compliance with the independence requirements of candidates nominated as such, pursuant to art. 6 of Agreement 138 of 2025. See: https://isa.co/en/isa-group/board-of-directors/</p>
<p>16.6. The Company, through its internal regulations, considers that the Board of Directors, through its Chairman and with the support of the Appointments and Remunerations Committee or whoever performs their functions, is the most appropriate body to centralize and coordinate the process of forming the administrative body prior to the General Shareholders' Meeting. In this way, shareholders who, based on their stake, aspire to be part of the Board of Directors, may know the needs of the Board of Directors and express their aspirations, negotiate the stock proportions and the distribution between the various member types, present their candidates, and accept that the suitability of their candidates is evaluated by the Appointments and Remunerations Committee before the voting process in the General Shareholders' Meeting.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>All matters related to the board composition are coordinated prior to the General Shareholders' Meeting through the the Corporate Government, Sustainability, Technology, and Technology and Innovation Committee and its Chairman. This, pursuant to the provisions of paragraph 4 of title 2 and paragraph 2 of title 3 of ISA's Code of Good Governance, as well as articles 3 and 4 of the Functioning Regulations of the Board of Directors contained in Agreement 138 of said corporate body, and according to the functions of such Committee, as approved by Agreement 140 of the Board of Directors. In this sense, shareholders may submit Agreement Proposals regarding all matters included in the meeting Agenda. Prior to their election at the Shareholders' Meeting of March 26, 2025, the Corporate Governance, Sustainability, Technology, and Innovation Committee evaluated each of the candidates proposed by the shareholders, in accordance with the corporate governance framework All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>16.7. The Board of Directors Regulation establishes that the candidates' suitability evaluation is to be performed prior to the General Shareholders' Meeting, so that shareholders have enough information (personal qualities, suitability, career, experience, integrity, etc.) about the proposed candidates in advance for a proper evaluation.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>Agreement 138 of 2025 contains the Functioning Regulations of the Board of Directors, which article 4 establishes the procedure for receiving the candidates' resumes, as well as the procedure for the Corporate Governance, Sustainability, Technology, and Innovation Committee to evaluate their suitability prior to the General Shareholders' Meeting, where the voting process will be conducted and the Board members will be elected. The candidates are evaluated by the Corporate Governance, Sustainability, Technology, and Innovation Committee in accordance with the Succession Policy approved by the General Shareholders' Meeting. Prior to their election at the Shareholders' Meeting of March 26, 2025, the Corporate Governance, Sustainability, Technology, and Innovation Committee evaluated each of the candidates proposed by the shareholders, in accordance with the corporate governance framework. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>17.1. The Board of Directors Regulation established that the number of Independent and Shareholder-appointed Members shall always exceed Executive Members, whose number, if they join the Board of Directors, is the minimum necessary to meet the information and coordination needs between the Board of Directors and Senior Management of the Company.</p>	<p>Yes</p>	<p>March 27, 2006</p>		<p>The corporate bylaws and the Board of Directors' rules of procedure prohibit this body from having executive members by stipulating that company employees may not serve on the Board. All Senior Management members and legal representatives are ISA employees. In addition, the majority of the members of the Board of Directors of ISA are independent. According to the Bylaws, there shall be at least five independent members and, actually, our standard is even higher, as there are seven independent members out of a total of nine members. The structure of the Board of Directors can be found at: https://isa.co/en/isa-group/board-of-directors/https://www.isa.co/es/grupo-isa/junta-directiva/</p>

<p>17.2. Based on the minimum twenty-five percent (25%) of Independent Members established in Law 964 of 2005, the Company analyzes and voluntarily adjusts upward the number of Independent Members, considering, among others, that the number of independent members is related to the Floating Capital.</p>	<p>Yes</p>	<p>July 13, 2015</p>	<p>March 23, 2018</p>	<p>In accordance with Article 27 of ISA's Corporate Bylaws "The General Shareholders' Meeting, as part of the Board of Directors, shall elect at least five (5) independent members." This minimum number of independent members established in the Bylaws and the current structure of ISA's Board of Directors exceeds the minimum established in Law 964 of 2005 as the Board is made up of nine principal members, of which actually seven are independent members, as can be verified on the Company's website: https://isa.co/en/isa-group/board-of-directors/</p>
<p>18.1. The functions of the Board of Directors' Chairman are indicated in the Bylaws and their main responsibilities are those established in Recommendation 18.1</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>The functions of the Chairman of ISA's Board of Directors are indicated in article 28 of the Corporate Bylaws, within which functions included in Recommendation 18.1 are adopted. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>18.2. The Company's internal regulations provide the possibility that the Board of Directors' Chairman may receive special treatment with respect to other members regarding their obligations and remuneration, as a result of the extent of their specific functions and greater dedication.</p>	<p>Yes</p>	<p>March 26, 2021</p>		<p>The Corporate Bylaws (article 28) and the Regulations of the Board of Directors of ISA (article 22) set out special duties for the Chairman of the Board of Directors. The sole paragraph of article 28 of the Bylaws establishes a special remuneration for the position of Chairman of the Board of Directors, considering the degree of responsibility required, which was established at 198 Tax Value Units (UVT) for the period from April 1, 2024 to March 31, 2026 during the Ordinary General Shareholders' Meeting held on March 21, 2024. The Boards' Remuneration Policy also allows a differentiated remuneration for the Chairman of the Board of Directors. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>18.3. The Bylaws explain the rules for appointing the Secretary of the Board of Directors, among which those provided in Recommendation 18.3 stand out.</p>	<p>No</p>			<p>According to article 28 of the Bylaws, the Secretary of the Board of Directors is the Chief Legal Officer of the Company, and like the other members of Senior Management is appointed by the CEO of the Company by virtue of the function entrusted to them in article 42, paragraph 5 of the Bylaws.</p>
<p>18.4. The Board of Directors Regulations establish the duties of the Secretary, among which those set forth in Recommendation 18.4 are included.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>Article 23 of Agreement 138, which contains the Functioning Regulations of ISA's Board of Directors, establishes the functions of the Secretary, which include all those listed in Recommendation 18.4 of the Country Code. The Corporate Bylaws also include the Secretary's functions in article 28. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>18.5. The Board of Directors has formed an Appointments and Remunerations Committee.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>The Board of Directors formed the Organizational Talent Committee, which performs the functions of the Appointments and Remunerations Committee referred in the Country Code. This Committee is regulated by Agreement 141 of June 19, 2025. This Agreement is published on the Company's website: https://isa.co/en/, ISA, Corporate Governance, Board of Directors, Download Center. Likewise, the Corporate Governance Report presented to the General Shareholders' Meeting includes information on the main issues addressed by the Committee during the period. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate Governance Report</p>

18.6. The Board of Directors has formed a Risk Committee.	Yes	July 31, 2015	June 19, 2025	Seeking efficiency and effectiveness in the decision making process of the Board Committees, the functions of the former Corporate Governance, Sustainability, and Risk Committee and the Audit Committee were re-assessed. Consequently , all matters related to risk assessment were allocated to the Audit Committee, which now known as the Audit and Risk Committee. This, based on the view that such Committee would have more available time and therefore, allow for greater depth in risk analysis. Likewise, auditing and risk topics typically overlap. These modifications were implemented through Agreements 128 and 129 of April 26, 2022. The rules of procedure of the each of the Board's committees, including the Audit and Risk Committee, were updated in June 2025. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Agreement 139 of 2025 - Audit and Risk Committee Regulations
18.7. The Board of Directors has formed a Corporate Governance Committee.	Yes	April 30, 2004	June 19, 2025	The Board of Directors relies on the Corporate Governance, Sustainability, Technology, and Innovation Committee, which performs the functions of the Corporate Governance Committee referred to the Country Code. This Committee is regulated by Agreement 140 of 2025. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/
18.8. If the Company has considered that is not necessary to form all these Committees, their functions have been distributed between the existing committees, or have been entirely assumed by the Board of Directors.	Yes	July 31, 2015	June 19, 2025	ISA has the Organizational Talent Committee; the Corporate Governance, Sustainability, Technology, and Innovation Committee; and the Audit and Risk Committee, through which Risk and Corporate Governance functions were channeled. On the other hand, the paragraph of article 3 of Agreement 140 of the Board of Directors, which regulates ISA's Corporate Governance, Sustainability, Technology, and Innovation Committee, provides this Committee with a general clause of competence so that it knows about any matter not specifically assigned to a Board Committee or to an occasional Committee created for a specific matter. Additionally, the Board of Directors has created a Business Committee that supports the Board and Management in the analysis and monitoring of ISA's business and investments. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/board-of-directors/

<p>18.9. Each Board of Directors' Committee has Internal Regulations governing its formation, the subjects, functions to be performed by it, and its operation, paying special attention to the communication channels between the Committees and the Board of Directors and, in the case of Conglomerates, to the relationship and coordination mechanisms between the Board of Directors' Committees of the Parent Company and the Subordinated Companies, if they exist.</p>	<p>Yes</p>	<p>September 30, 2005</p>	<p>June 19, 2025</p>	<p>ISA's Board of Directors has four committees: the Audit and Risk Committee; the Business Committee; the Corporate Governance, Sustainability, Technology, and Innovation Committee; and the Organizational Talent Committee. Each of these committees has its own internal regulations, which govern matters such as functions, structure, duties and responsibilities, conflicts of interest, among others. All information related to the Board of Directors, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/board-of-directors/</p>
<p>18.10. The Board Committees are made up exclusively by Independent or Shareholder-appointed Members, with a minimum of three (3) members, chaired by an Independent Member. In the event of the Appointments and Remunerations Committee, Independent Members are always a majority.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>ISA's Board of Directors and therefore the Committees do not have Executive Members, as the Corporate Bylaws prohibit company employees from being members of the Board of Directors. Therefore, the four existing Board Committees (Corporate Governance, Sustainability and IT; Organizational Talent; Audit and Risk; and Business Committees) are composed exclusively of equity or independent members. All Board Committees are made up of more than 3 members, a majority of independent members, and are chaired by an independent member. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>18.11. The Board Committees may obtain temporary or permanent support from Senior Management members with experience in the matters of their competence and/or external experts.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>The Board of Directors and Board Committees may be supported by Senior Management or external consultants. The Corporate Bylaws establish the right of the members of the Board of Directors to be supported by experts. Article 25 of Agreement 138 of the ISA Board of Directors also establishes this right. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/board-of-directors/</p>

<p>18.12. For the formation of its Committees, the Board of Directors considers profiles, knowledge, and professional experience of members with respect to the matter to be addressed by the Committee.</p>	<p>Yes</p>	<p>May 29, 2009</p>	<p>June 19, 2025</p>	<p>Pursuant to the provisions of paragraph 8 of title 3 of the Code of Good Governance, members of the Committees are elected based on their profiles and knowledge required to ensure that the Committee's purposes are reached. Likewise, Article 35 of Agreement 138 on the operation of ISA's Board of Directors establishes the manner in which the different Board Committees shall be formed. It is provided therein that the selection of the members of each Committee shall be based on their education and experience, as well as the purposes pursued by each Committee. It is noteworthy that the Board of Directors' Committees are integrated by the same Board members, who comply with the professional competence, suitability, and moral solvency criteria pursuant to Article 27 of ISA's Corporate Bylaws and the Board of Directors Succession Policy. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>18.13. Minutes are taken of the Committee meetings, a copy of which is sent to all the members of the Board of Directors of the Company. If the Committees have been granted delegated decision-making powers, the minutes shall comply with the requirements of Articles 189 and 431 of the Code of Commerce.</p>	<p>Yes</p>	<p>May 29, 2009</p>	<p>June 19, 2025</p>	<p>The Operating Regulations of each Committee stipulate that the Committees will prepare minutes of their meetings pursuant to the Code of Commerce. The Secretaries of the respective Committees will be responsible for their control and confidentiality. At each Board of Directors meeting, the chairpersons of the committees present a report detailing the activities of the committees corresponding to what was discussed at the meetings and noted in the minutes. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>18.14. Except that the legal or regulatory applicable framework requires its formation, in the case of Conglomerates, the internal regulation provides that the Board of Directors of the Subordinate Companies may choose not to form specific Committees for the treatment of certain matters, and that these tasks may be assumed by the Board Directors' Committees of the Parent Company, without this implying a transfer to the Parent Company of the responsibility of the Boards of Directors of the subordinate companies.</p>	<p>Yes</p>	<p>July 31, 2015</p>		<p>In this regard, we inform that ISA's Board Committees have assigned functions that cover all the companies of ISA, which seek the consolidation of the unity of purpose and direction of the Group through their policies and guidelines. However, the Board of Directors of each company of the Group, where executives of ISA participate, may choose to create Board Committees after analyzing the need and value of their existence, pursuant to Subparagraph i) of Article 3 of Agreement 110 of 2017. The participation of ISA executives in the Boards of its companies ensures that this analysis is carried out articulately and consistently with the guidelines of ISA's Board of Directors and its Committees. All of the above is part of the role assigned to ISA within the business group whose parent company is Ecopetrol, established in Article 5 of ISA's Bylaws. All information related to the Board of Directors and the Committees, the Corporate Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>18.15. The Audit Committee's main task is to assist the Board of Directors in its function as supervisor by evaluating the accounting procedures, the work with the Statutory Auditor and, in general, the revision of the Company's Control Architecture, including auditing the risk management system implemented by the Company.</p>	<p>Yes</p>	<p>September 30, 2005</p>	<p>June 19, 2025</p>	<p>The Audit and Risk Committee held 13 sessions throughout 2025. During these meetings, various topics were discussed, including internal auditing, internal accounting controls, comprehensive risk management, and issues related to the ethics and compliance program, among others. The 2025 annual corporate governance report will contain information on the main issues addressed by this committee during this reporting period. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/board-of-directors/ See Committees section</p>
<p>18.16. The members of the Audit Committee are knowledgeable in accounting, financial and other related matters, which enables them to make accurate judgments on matters within the Committee's jurisdiction at a level sufficient to understand their scope and complexity.</p>	<p>Yes</p>	<p>May 29, 2009</p>		<p>The Audit and Risk Committee is composed of five members, four of whom are independent and recognized for their outstanding careers in various fields, such as economics, finance, administration, as well as for their in-depth knowledge in the electricity sector and regulation. The resumes of these members are available to the public on the organization's website, in compliance with paragraph 8.3 of title 3 - Administration Bodies of the Code of Good Governance. The selection of the members of the Committee is based on their profiles and knowledge, thus ensuring that they possess the necessary skills to effectively perform the functions of the Audit Committee. Audit Committee members (DAVID ALFREDO RIAÑO ALARCÓN, CAMILO ZEA GÓMEZ, LUIS FERNEY MORENO CASTILLO, LUCÍA CRISTINA DÍAZ ARMENTA, JUAN EMILIO POSADA) All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ https://isa.co/en/isa-group/board-of-directors/</p>
<p>18.17. At the request of the Meeting's Chairman, the Chairman of the Audit Committee reports to the General Shareholders' Meeting on specific aspects of the activities carried out by the Committee, such as the analysis of the scope and content of the Statutory Auditor's Report.</p>	<p>Yes</p>	<p>July 31, 2015</p>		<p>The Audit and Risk Committee submits monthly reports to the Board of Directors on the topics addressed at each meeting. Accordingly, the Board of Directors provides reports to the General Shareholders' Meeting on the various matters discussed during the fiscal period. The internal control report is included in the management report submitted by the CEO to the General Shareholders' Meeting.</p>

<p>18.18. The Internal Regulations of the Audit Committee assign to it the functions set forth in Recommendation 18.18.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>The Audit and Risk Committee is governed by Board of Directors Agreement No. 139 of 2025, which amended Agreement No. 128 of 2022. Agreement 139 comprehensively addresses the recommendations set forth in Recommendation 18.18 of the Country Code. For a more detailed understanding, please review article 3 of the agreement, which focuses on FUNCTIONS. This section provides a description of the responsibilities assigned to the Audit and Risk Committee, highlighting its role in matters related to internal control, internal and external audit, risk management, compliance, and other key aspects that ensure transparency and efficiency in business management. This proactive approach demonstrates the Board's commitment to excellence in governance, strengthening stakeholder trust in the entity. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Agreement 139 of 2025</p>
<p>18.19. The main objective of the Appointments and Remunerations Committee is to support the Board of Directors in the exercise of its decision-making or advisory functions regarding the appointment and remuneration of the Board of Directors and Senior Management members and to ensure compliance with Corporate Governance regulations, periodically reviewing compliance, recommendations, and principles (in those cases when this function is not expressly attributed to another Company's Committee).</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>The Organizational Talent Committee is regulated by Agreement 141 of June 19, 2025 of ISA's Board of Directors, which performs the functions of the Appointments and Remunerations Committee referred to in the Country Code and those listed in Recommendation 18.19 regarding Senior Management. The functions indicated in this Recommendation in relation to the members of the Board of Directors are assigned to the Corporate Governance, Sustainability, Technology, and Innovation Committee. Information on the management of these committees during 2025 can be found in the Corporate Governance Report that is part of the Integrated Management Report 2025. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate Governance Report</p>

<p>18.20. Some members of the Appointments and Remunerations Committee have expertise in strategy, human resources (recruitment and selection, hiring, training, administration, or staff management), wage policy, and related subjects, with a sufficient level to understand the scope and complexity of these matters within the Company.</p>	<p>Yes</p>	<p>September 30, 2005</p>	<p>April 30, 2020</p>	<p>Pursuant to the provisions of paragraph 8 of title 3 of the Code of Good Governance, the members of the Committees are elected according to their profile and knowledge associated with the subjects under the responsibility of this Committee and as per the Organizational Talent Committee purposes, including those listed in the Recommendation. The skill matrix, experiences, and resumes of the Board's members can be found at: www.isa.co, ISA section Group, Corporate Governance, Board of Directors. https://isa.co/en/isa-group/board-of-directors/</p>
<p>18.21. At the request of the Chairman of the Meeting, the Chairman of the Appointments and Remunerations Committee's may report to the General Shareholders' Meeting on specific aspects of the work done by the Committee, such as the monitoring of remuneration policies of the Board of Directors and Senior Management.</p>	<p>Yes</p>	<p>July 31, 2015</p>		<p>Pursuant to Paragraph 22 of Article 34 of the Corporate Bylaws, the Board of Directors is responsible for approving the Annual Corporate Governance Report, which includes a report from each of the Board Committees. It is read by the Chairman of the Board of Directors at the General Shareholders Meeting and is part of the Integrated Management Report that can be found on the corporate website: https://isa.co/en/, ISA, Corporate Governance, Download Center. The 2025 Management Report will be published with the information from the Ordinary General Shareholders' Meeting.</p>
<p>18.22. The Internal Regulations of the Appointments and Remuneration Committee assign to it the functions set forth in Recommendation 18.22.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>ISA has an Organizational Talent Committee, which performs the functions of the Appointments and Remunerations Committee, regulated by Agreement 141 of June 19, 2025 of ISA's Board of Directors, and contains the functions listed in Recommendation 18.22 regarding the Company's Senior Management and employees. The Corporate Governance, Sustainability, Technology, and Innovation Committee has the functions indicated in Recommendation 18.22 in relation to the Board of Directors. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/board-of-directors/</p>

<p>18.23. The main purpose of the Risk Committee is to assist the Board of Directors in fulfilling its oversight responsibilities regarding risk management.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>The Audit and Risk Committee, which is regulated by Agreement 139 of June 19, 2025, performs the functions of the Risk Committee referred to in the Country Code. The functions of the aforementioned Committee include: i. assisting the Board of Directors in fulfilling its oversight responsibilities regarding risk management and on matters raised by shareholders in this regard; ii. reporting to the Board of Directors on the effective implementation of the comprehensive risk management model, so that the main risks are identified, managed, and appropriately communicated to the Board, and iii. reviewing and evaluating the integrity and adequacy of the risk management function, assigning responsibilities for the integrity and adequacy of said function within ISA and its companies, as applicable, among other duties. See https://isaasprods-d87a26cb809c1f43d1f1-endpoint.azureedge.net/blobisaasprods27f2ae9b77/wp-content/uploads/2025/09/agreement-139-audit-and-risk-committee-19062025.pdf. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>18.24. At the request of the Meeting's President, the Risk Committee's President may report to the General Meeting of Shareholders on specific aspects of the activities conducted by the Committee.</p>	<p>Yes</p>	<p>July 31, 2015</p>		<p>Pursuant to Paragraph 22 of Article 34 of the Corporate Bylaws, the Board of Directors is responsible for approving the Annual Corporate Governance Report, which includes a report from each of the Board Committees. It is read by the Chairman of the Board of Directors at the General Shareholders Meeting and is part of the Integrated Management Report that can be found on the corporate website: https://isa.co/en/, ISA, Corporate Governance, Download Center. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/. See Download Center - Corporate Governance Report, General Shareholders' Meeting History</p>
<p>18.25. With the necessary adjustments to distinguish between companies belonging to the financial sector and those belonging to the real sector of the economy, and without prejudice to the functions entrusted to this Committee by current regulations, the Internal Regulations of the Risk Committee assign to it the functions set forth in Recommendation 18.25.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>ISA has an Audit and Risk Committee, which is regulated by Agreement 139 of June 19, 2025, which performs the functions established in Recommendation 18.25 of the Country Code, according to the nature of ISA and the activities it carries out. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>18.26. The main task of the Corporate Governance Committee is to assist the Board of Directors in its duties of proposing and supervising the Corporate Governance Recommendations adopted by the Company.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>As established in Agreement 140 of June 19, 2025, the Corporate Governance, Sustainability, Technology, and Innovation Committee's functions include the formulation of proposals and actions for the implementation of better Corporate Governance practices, as well as ensuring compliance with the Code of Good Corporate Governance and other Codes of Conduct adopted by the Company. This Agreement is published on the corporate website https://isa.co/en/, ISA section, Corporate Governance, Download Center. Information on the management of this Committee can be found in the annual Corporate Governance Report. This report will be posted on the corporate website with the information of the Ordinary General Shareholders' Meeting.</p>
<p>18.27. The Internal Regulations of the Corporate Governance Committee assign to it the functions set forth in Recommendation 18.27.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>Agreement 140 of June 19, 2025 of ISA's Board of Directors regulates the Corporate Governance, Sustainability, Technology, and Innovation Committee, which has among its functions those established in Recommendation 18.27. This Agreement is published on the corporate website: https://isa.co/en/, ISA, section Corporate Governance, Download Center. https://isaasprods-d87a26cb809c1f43d1f1-endpoint.azureedge.net/blobisaasprods27f2ae9b77/wp-content/uploads/2025/09/agreement-140-gsti-committee-19062025.pdf</p>
<p>19.1. The Chairman of the Board of Directors, with the support of the Secretary and the CEO, is in charge of preparing a Board work plan for the period being evaluated, which will serve as a tool to determine the reasonable number of ordinary meetings per year and their estimated duration.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>Agreement 138 of 2025, which regulates the operations of ISA's Board of Directors, establishes that the Chairman of the Board shall present an annual work plan to coordinate and plan the Board's operation. The Agreement sets out the tools for adequate planning and development of the Board of Directors' meetings. This annual work plan is reflected in the annual Agenda approved by the Board of Directors during the first half of each year. Compliance with this Recommendation can be verified in the annual Corporate Governance Report that will be published with the information from the Ordinary General Shareholders' Meeting. https://isa.co/en/isa-group/general-shareholders-meeting/</p>

<p>19.2. Except for supervised entities, which are required to hold at least one (1) meeting per month, the Board of Directors of the Company holds between eight (8) and twelve (12) ordinary meetings per year.</p>	<p>Yes</p>	<p>May 29, 2009</p>	<p>June 19, 2025</p>	<p>In accordance with Article 30 of the Bylaws and Article 15 of Agreement 138 of operation of ISA's Board of Directors, the latter meets at least once a month. In other words, it meets regularly at least 12 times per year. The Corporate Governance Report attached to the Integrated Management Report presented at the Ordinary General Shareholders' Meeting shows the number of meetings scheduled for 2025 and attendance by members. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>19.3. One (1) or two (2) Board meetings per year have a clear focus on defining and monitoring the Company's strategy.</p>	<p>Yes</p>	<p>January 30, 2012</p>	<p>June 23, 2023</p>	<p>The Board of Directors, in its regular sessions, always holds four meetings a year focused on reviewing and monitoring ISA's strategy through the Balanced Scorecard, which reflects short-term goals based on expected long-term contributions. The 2025 Annual Corporate Governance Report, which will be published along with the information from the Ordinary General Shareholders' Meeting, will include the topics addressed by the Board of Directors regarding the approval of strategic objectives and interim goals, strategy monitoring, and the strategy workshops held during extraordinary meetings. See https://isa.co/en/isa-group/general-shareholders-meeting/</p>
<p>19.4. The Board of Directors approves a specific calendar of ordinary meetings, without prejudice to the fact that it may meet as often as necessary in extraordinary circumstances.</p>	<p>Yes</p>	<p>May 29, 2009</p>	<p>June 19, 2025</p>	<p>In accordance with Agreement 138 of operation of ISA's Board of Directors, it approves (no later than April) the annual meeting schedule of the corresponding year. The agreement also provides for the possibility of extraordinary meetings of the Board of Directors, when they are summoned by the Company's CEO, the Statutory Auditor, two of its members, or summoned by itself. The Corporate Governance Report attached to the Integrated Management Report that is presented at the Ordinary General Shareholders' Meeting, shows the number of meetings scheduled for 2025. See https://isa.co/en/, ISA, Corporate Governance, General Shareholders' Meeting, Integrated Management Report - annex Annual Corporate Governance Report, which will be published with the information of the Ordinary General Shareholders' Meeting.</p>

<p>19.5. Together with the call for the meeting and at least five (5) business days in advance, the documents or the information associated with each item on the Agenda shall be delivered to the members of the Board, so that they can actively participate and make reasonable decisions.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>Agreement 138 of operation of ISA's Board of Directors regulates the summoning and provision of information to the Board, in accordance with the provisions of Recommendation 19.5. The information on each item on the Agenda is made available to the Board Members at least five business days prior to the meeting date via a technological solution for the management of all the Boards of Directors of ISA and its companies, which can be consulted from mobile devices and computers. Board members have easy, secure, and timely access to this app from anywhere (only internet required), where they can consult the information of all meetings. The documents or information associated with each item of the Agenda for each Board of Directors' Meeting are made available to the Board members five (5) business days in advance through this app. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>19.6. The Chairman of the Board of Directors, assisted by the Secretary of the Board of Directors, is ultimately responsible for ensuring that the members receive the information sufficiently in advance and that the information is useful, so that in the package of documents that is delivered (Board of Directors dashboard), quality shall take precedence over quantity.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>The Corporate Bylaws and Agreement 138 of operation of ISA's Board of Directors, available on the website: https://isa.co/en/, ISA/ Corporate Governance establish as responsibilities of the Chairman and the Secretary of the Board to deliver in a timely and adequate manner the information associated with the corresponding Board Meeting. Likewise, in the 2025 Corporate Governance Report presented to the Shareholders' Meeting, the functioning of the meeting in 2025 is explained in detail. See the Board chapter of the Report. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate Governance Report.</p>

<p>19.7. The Chairman of the Board of Directors (and not the CEO) is responsible for preparing the Agenda of the Board meetings. This Agenda is structured according to certain parameters that allow following a logical order for the presentation of the topics and debates.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>Article 28 of the Corporate Bylaws and article 22 of Operating Regulation 138 of ISA's Board of Directors stipulate that the Chairman of the Meeting shall define the Agenda in coordination with the CEO, the Secretary, and other members of the Board. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate Governance Report</p>
<p>19.8. In the Annual Corporate Governance Report and in the corporate website, the Company publishes the quorum of members to Board and Committee meetings.</p>	<p>Yes</p>	<p>March 30, 2006</p>		<p>Pursuant to paragraph 15 of Article 28 of the Bylaws, the Chairman of the Board shall present before the General Shareholders' Meeting, at each ordinary meeting, a report about the Board of Directors' operation, which will include the following aspects, among others: a) Effective meetings held and their periodicity; b) Attendance to the Board of Directors' meetings of each of its members; c) Main topics discussed at the Board's meetings; d) Conflicts of interest; e) Board of Directors Committees; f) Results of the self-evaluation executed by each of the Board of Directors' members or other evaluation mechanisms established by it. This information is contained in the Corporate Governance Report presented by the Chairman of the Meeting at the Shareholders' Meeting. For 2025, this report will be available together with the information from the Ordinary Meeting at: https://isa.co/en/isa-group/general-shareholders-meeting/</p>

<p>19.9. Each year, the Board of Directors evaluates the effectiveness of its work as a collegial body, that of its Committees, and that of its individual members, including peer evaluation, as well as the reasonableness of its internal rules and the dedication and performance of its members, proposing, where appropriate, the modifications to its structure and operation that it deems appropriate. In the case of Conglomerates, the Board of Directors of the parent company requires that the evaluation process is carried out also in the Board of Directors of the Subordinate Companies.</p>	<p>Yes</p>	<p>February 28, 2004</p>	<p>March 27, 2015</p>	<p>The Board of Directors carries out annual evaluation processes. Paragraph 2 of article 27 of ISA's Corporate Bylaws establishes that the members of the Board of Directors shall self-evaluate according to mechanisms defined by the same Board of Directors, without prejudice to other evaluation mechanisms determined by it. The Chairman of the Board shall report the results of the evaluation to the General Shareholders' Meeting. In accordance with Section 10 of Title 3 of the Code of Good Governance, an external evaluation conducted by independent consultants was used to evaluate the Board of Directors in 2025. The Chairman of the Board of Directors reports the results of the evaluation at the General Shareholders' Meeting. These results are also part of the Corporate Governance Report available on the website: https://isa.co/en/ ISA, section, Corporate Governance, Shareholders' Meeting https://isa.co/en/isa-group/general-shareholders-meeting/. All information related to the Board of Directors and Committees, Bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate Governance Report.</p>
<p>19.10. The Board of Directors alternates the internal self-evaluation technique with the external evaluation by independent consultants.</p>	<p>Yes</p>	<p>February 28, 2004</p>	<p>March 27, 2015</p>	<p>The Board of Directors periodically alternates the self-evaluation with an external evaluation, which is provided for in paragraph 2 of Article 27 of the Corporate Bylaws and in the Functioning Regulations of the Board of Directors. It also complies with the provisions of paragraph 10 of title 3 of the Code of Good Governance. In the Corporate Governance Report attached to the 2025 Integrated Management Report, it can be verified that for April 2025-March 2026, an external evaluation methodology was applied and, in the Corporate Governance Report attached to the 2024 Integrated Management Report, it can be verified that for the period April 2024-March 2025, the self-evaluation methodology was applied. The aforementioned reports are published on the corporate website, ISA/Corporate Governance/Shareholders' Meeting. https://isa.co/en/isa-group/general-shareholders-meeting/. All information related to the Board of Directors and Committees, Bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>20.1. The Board of Directors Regulations complement the provisions of the legal framework regarding the duties and rights of the Board members.</p>	<p>Yes</p>	<p>May 29, 2009</p>	<p>June 19, 2025</p>	<p>The Functioning Regulations of the Board of Director (Agreement 138) provides for the specific obligations and rights of its members, complementing those established by law. The duties and rights are the ones that correspond to them as Administrators and those provided for in article 35 of the Corporate Bylaws. In addition, in the Code of Good Corporate Governance, title 3, paragraph 5, these duties and rights are explained. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>20.2. The Board of Directors Regulations elaborate on the Company's understanding of the duties of the Board members referred to in Recommendation 20.2.</p>	<p>Yes</p>	<p>May 29, 2009</p>	<p>November 25, 2016</p>	<p>Agreement 138 of the Board of Directors refers to the Corporate Bylaws, in which the duties of the Board members, established in Recommendation 20.2, are described. Likewise, in the Code of Good Corporate Governance, title 3, paragraph 5, these duties and rights are explained. The Corporate Bylaws, the Functioning Regulations of the Board of Directors, and the Code of Good Corporate Governance are available on the website: https://isa.co/en/, ISA Group, Corporate Governance, Download Center.</p>
<p>20.3. The Board of Directors Regulations elaborate on the rights of the Board members as set forth in Recommendation 20.3.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>November 25, 2016</p>	<p>Agreement 138 of the Board's Functioning Regulations develops the information rights' content, support of experts, adequate remuneration, as well as permanent induction and training. Likewise, title 3, paragraph 5 of the Code of Good Corporate Governance sets forth the rights of the members of the Board of Directors. The Corporate Bylaws, the Functioning Regulations of the Board of Directors, and the Code of Good Corporate Governance are available on the website: https://isa.co/en/, ISA Group/ Corporate Governance/ Download Center.</p>

<p>21.1. The Company has a policy and a procedure defined and formalized in the internal regulation for the understanding, management, and resolution of conflicts of interest, whether directly or indirectly through Related Parties, that can affect Board members and other Managers.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>ISA's Corporate Bylaws and Code of Good Governance define what is understood by conflict of interest and describes the general policy regarding conflicts of interest, which is applicable to employees, members of the Board of Directors, and other administrators. The Board of Directors approved the special procedure for the management of conflicts of interest of administrators, which is incorporated in the Code of Good Corporate Governance, title 3, paragraph 14. The Board of Directors updated the operating regulations for this body through Agreement 138 of June 19, 2025. Article 13 of that agreement formalized best practices regarding the handling of conflicts of interest involving members of the Board of Directors, which were incorporated into the operating regulations of the Board's committees. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>21.2. The procedure for managing conflicts of interest distinguishes between sporadic and permanent conflicts of interest. If the conflict of interest is sporadic, the applicable procedure indicates the rules and steps to be followed, which should be relatively easy to deal with and difficult for the affected party to avoid. In the case of permanent conflicts of interest, the procedure considers that if this situation affects the entire operations of the Company, it should be understood as a cause of obligatory resignation by the affected party since it makes him/her unable to serve.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>The Board of Directors approved the procedure for the management of conflicts of interest of administrators, which describes the different types of conflict of interest, as per the provisions of Recommendation 21.2 This procedure is incorporated in the Code of Good Corporate Governance, title 3, paragraph 14 and in the Functioning Regulations of the Board of Directors (Agreement 138, 2025). All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>21.3. The members of the Board of Directors, Legal Representatives, Senior Management, and other Managers of the Company periodically report to the Board of Directors about the direct and indirect relationships existing among themselves, or with other entities or structures belonging to the Group; or with the issuer, suppliers, or customers; or with any other Stakeholders from which situations of conflict of interest may arise or influence their opinion or vote, this way building a "Related-Party Map" of Managers.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>In accordance with the provisions of Article 44 of the Company's Bylaws, Article 13 of the Board of Directors Functioning Regulations, and pursuant to the provisions of the procedure for the management of conflicts of interest of administrators incorporated in the Code of Good Corporate Governance, ISA's administrators have the duty to inform the Board of Directors of conflicts of interest arising from the relationships indicated in Recommendation 21.3, immediately the situation arises. In addition, persons nominated as board members shall complete the nomination acceptance form provided by the Company, in which they shall inform, among other things, their relationships with shareholders, suppliers, clients, allies, and other administrators of ISA. In this way, situations that may constitute conflicts of interest, disqualification, or incompatibility are made known to and evaluated by the Corporate Governance, Sustainability, Technology, and Innovation Committee within the candidate evaluation process, and then reported to the Board of Directors. Likewise, individuals who are to be appointed as ISA executives must complete a form regarding their relationships and related parties in order to identify actual and potential disqualifications, incompatibilities, and conflicts of interest. In the ISA Anti-Corruption and Anti-Bribery Guide, Conflicts of Interest section, rules are established regarding the disclosure of potential sources of conflicts of interest applicable to all ISA administrators and employees, prior to their employment and annually. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ https://isa.co/isa-2/somos-eticos/ See Anti-Corruption and Anti-Bribery Management Guide</p>

<p>21.4. Relevant conflict of interest situations, which are understood as those that would force the affected party to abstain from attending a meeting and/or voting, in which the members of the Board of Directors and other Administrators are involved, are included in the public information published annually by the Company on its website.</p>	<p>Yes</p>	<p>March 30, 2005</p>		<p>The Annual Corporate Governance Report, which is part of the Integrated Management Report and is published on the corporate website, indicates the relevant conflicts of interest presented during the 2025 period, according to Recommendation 21.4. The Annual Corporate Governance Report is posted on the Download Center section of the website.</p>
<p>21.5. For these purposes, the definition of the Related Parties implemented by the Company is consistent with International Accounting Standard No. 24 (IAS 24).</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>November 26, 2015</p>	<p>In the procedure for the management of conflicts of interest of administrators, the definitions of IAS 24 are applied. The procedure is incorporated in the Code of Good Corporate Governance, Title 4, paragraph 14. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/http://www.isa.co/es/grupo-isa/gobierno-corporativo/</p>
<p>22.1. The Company has a policy that defines the concrete procedure for the assessment, approval, and disclosure related-party transactions, including outstanding balances and relationships between them, except for those transactions that have a specific regulation.</p>	<p>Yes</p>	<p>November 15, 2001</p>	<p>October 29, 2020</p>	<p>In order to strengthen good practices at ISA and its companies, the Board's Corporate Governance Committee approved the Corporate Guideline for Related-Party Transactions, whereby the guidelines set forth in ISA's Code of Corporate Good Governance for carrying out this type of transaction were extended to all ISA companies. Title 6 of the Code of Good Corporate Governance establishes the procedure for identifying, assessing, approving, disclosing, and monitoring transactions between ISA and its related parties. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>22.2. The Company's policy on related-party transactions addresses the aspects covered by Recommendation 22.2.</p>	<p>Yes</p>	<p>October 29, 2020</p>		<p>The Corporate Governance Committee of the Board of Directors approved the procedure for the identification, assessment, approval, disclosure, and monitoring of business transactions between ISA and its related parties, which is incorporated in the Code of Good Corporate Governance, title 6. In line with the Corporate Guideline on Related-Party Transactions, all transactions shall be carried out at market prices and conditions, respect the rights of all shareholders, especially minority shareholders, and not jeopardize the ability of the Group companies to meet their obligations to third parties, among others. From this procedure, it is highlighted that ISA's material transactions are previously assessed by the Audit and Risk Committee and their approval corresponds to the Board of Directors or the Shareholders' Meeting, according to the statutory powers of each body and the applicable law. Considering the composition of ISA's Board of Directors, made up of a majority of independent members (7 out of 9 members are independent), it was not considered necessary to establish a qualified majority. Non-recurring material transactions always shall be assessed by an independent third party. The Audit and Risk Committee ensures that non-material transactions comply with the Corporate Guideline and procedure. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>22.3. The policy establishes that recurring related-party transactions within the ordinary course of business carried out under adhesion contracts, or general framework contracts, which conditions are perfectly standardized, are applied on a massive scale, and are carried out at market prices, generally set by whoever acts as supplier of the respective good or service, and which individual amount is not relevant for the Company, do not require the express authorization of the Board of Directors.</p>	<p>Yes</p>	<p>January 29, 2016</p>	<p>October 29, 2020</p>	<p>The Corporate Governance, Sustainability, Technology, and Innovation Committee of the Board of Directors approved the procedure for the identification, assessment, approval, disclosure, and monitoring of business transactions between ISA and its related parties, which is incorporated in the Code of Good Corporate Governance, title 6. In the procedure, transactions are classified as recurring or non-recurring, material or non-material, according to the particular characteristics of ISA's business, and approval instances are defined accordingly. Non-material recurring transactions do not require the approval of the Board of Directors; however, they shall comply with the procedure defined for their proper documentation, valuation, disclosure, and supervision, which is reported annually to the Audit and Risk Committee. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>23.1. The Company has a policy of remuneration of the Board of Directors, approved by the General Meeting of Shareholders and reviewed each year, which identifies all the compensation components that can be effectively fulfilled. These components may be fixed or variable. They may include fixed fees for being a Board member, fees for attending Board and/or Committee meetings and other payments of any kind earned during the year, whatever their origin, in cash or in kind, as well as the Company's pension obligations or payment of life insurance premiums, or other items, for both former and current members, as well as those insurance premiums for civil liability (D&O policies) contracted by the Company for Board members.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>March 26, 2025</p>	<p>ISA has a Board of Directors Remuneration Policy approved by the General Shareholders' Meeting and reviewed annually by this corporate body. This Policy establishes that the remuneration of the Board members shall be fixed and approved each year by the General Shareholders' Meeting. Likewise, all the remuneration components that can actually be paid, as well as the non-remuneration components, are clearly identified. This policy was again approved by the Ordinary General Shareholders' Meeting of March 26, 2025 without any modification. This policy is posted on the corporate website. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate policy on Board of Directors remuneration</p>
<p>23.2. If the Company adopts compensation systems through the recognition of a variable component linked to the good performance of the Company in the medium and long term, the remuneration policy incorporates limits on the amount that can be distributed to the Board of Directors and, if the variable component is related to the Company's profits or other management indicators at the end of the period evaluated, any qualifications contained in the Statutory Auditor's report that could reduce profits for the period shall be taken into account.</p>	<p>No</p>			<p>ISA does not adopt remuneration systems such as those indicated in the Recommendation for members of the Board of Directors. These members only receive fixed fees approved by the General Shareholders' Meeting, which are defined in accordance with the Board of Directors Remuneration Policy adopted by the Meeting.</p>

<p>23.3. Shareholder-appointed and Independent Members of the Board of Directors are expressly excluded from remuneration systems that incorporate stock options or variable compensation linked to the absolute variation of the stock price.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>ISA does not adopt remuneration systems such as those described in the Recommendation. The Board of Directors Remuneration Policy establishes that remuneration will be the same for all members. In addition, other than fees for attending Board of Directors or Board Committee meetings, members do not receive any other type of individual or collective remuneration or compensation. All information related to the Board of Directors and the Committees, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate policy on Board of Directors remuneration</p>
<p>23.4. For each period evaluated, within the framework of the remuneration policy, the General Shareholders' Meeting approves a ceiling cost of the Board of Directors in respect to all approved remuneration components.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>March 26, 2025</p>	<p>The Board of Directors Remuneration Policy establishes that the remuneration of the Board members will be fixed and approved each year by the General Shareholders' Meeting. The Ordinary Shareholders' Meeting approves the fees of the members of the Board of Directors in accordance with the parameters defined in the policy, as can be verified in the minutes of the 2025 Ordinary Shareholders' Meeting. The corporate website: https://isa.co/en/, ISA, Corporate Governance, General Shareholders' Meeting, Summary of Minutes, shows the approval of the Remuneration Policy of the Board of Directors in the different Ordinary Shareholders' Meetings. See summary of minutes at https://isa.co/en/isa-group/general-shareholders-meeting/</p>
<p>23.5. The total effective cost of the Board of Directors during the period evaluated, which includes all the remuneration components paid to the Board members as well as the reimbursement of expenses, is made known to the shareholders and published on the Company's website, with the level of disaggregation and detail approved by the Board of Directors.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>Information concerning the remuneration of the Board of Directors is informed to shareholders every year at the Ordinary General Shareholders' Meeting, which fixes and approves the remuneration of all members of the Board of Directors for the respective period in accordance with the Board of Directors Remuneration Policy adopted by the Meeting, which does not provide any type of reimbursement of costs. The remuneration of the Board members is published on the corporate website: https://isa.co/en/, ISA section, Corporate Governance, Board of Directors. In addition, this information can be found in the minutes of the General Shareholders' Meeting and in ISA's Integrated Management Report, which are also published on the Company's website. https://isa.co/en/isa-group/general-shareholders-meeting/ https://isa.co/en/isa-group/board-of-directors/</p>

<p>24.1. The Company's governance model establishes an effective division between the Company's administration or governance (represented by the Board of Directors) and the Ordinary Course of Business (under the responsibility of Senior Management with the leadership of the CEO).</p>	<p>Yes</p>	<p>March 18, 2002</p>	<p>September 30, 2025</p>	<p>The Corporate Bylaws establish the functions of the Board of Directors and those of the CEO. These bylaws provide for the effective separation between the Company's management or governance and the ordinary course of business. The Code of Good Corporate Governance - Title 3 clearly explains the different roles, attributions, and responsibilities of the Board of Directors and Senior Management. Complementarily, in the agreements that regulate the functioning of the Board of Directors and the committees of ISA board of directors, their competences are evidenced. There is also a framework for the relationship between ISA and its companies, approved by ISA's Board of Directors in 2019 and reviewed in 2025 by the Corporate Governance, Technology and Innovation, and Organizational Talent Committees, which outlines the relationship between ISA and its companies, aligning the principles of corporate governance and managerial governance, and is applied in accordance with the general guidelines and governance model of the parent company of the Ecopetrol business group, to which ISA belongs. See article 5 of ISA's Corporate Bylaws. All information related to the Board of Directors and Senior Management, bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>24.2. Overall, it is the policy of the Board of Directors to delegate the ordinary course of business in the Senior Management, focusing its activity on the general functions of strategy, monitoring, governance, and control.</p>	<p>Yes</p>	<p>March 18, 2002</p>	<p>March 27, 2015</p>	<p>There is also a working model for ISA and its companies approved by ISA's Board of Directors in 2019 that describes the relationship between ISA and its companies, aligning the principles of corporate governance and management governance. It is applied taking into account the general guidelines and governance model of the parent company of the Ecopetrol business group, to which ISA belongs. Additionally, in title 3 of the Code of Good Corporate Governance, the functions of the Board of Directors and Senior Management are compiled and described according to the provisions of Recommendation 24.2. All information related to the Board of Directors and Senior Management, bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>24.3. As a general rule, the members of Senior Management are identified, evaluated, and appointed directly by the Company's CEO since they are his/her direct collaborators. Alternatively, the Company may choose the members of Senior Management to be appointed by the Board of Directors if the Company's CEO proposes it. Regardless of who makes the final appointment, candidates for key executive positions in the Company are presented to and evaluated by the Appointments and Remunerations Committee of the Board of Directors, which shall issue its opinion.</p>	<p>Yes</p>	<p>July 31, 2015</p>	<p>June 19, 2025</p>	<p>The Organizational Talent Committee performs the functions that correspond to the Appointments and Remunerations Committee referred to in the Country Code. The CEO appoints the members of senior management, taking into account the planning and management of succession carried out by the Organizational Talent Committee of the Board of Directors. The duties of the Organizational Talent Committee can be found in the Committee's operating agreement at: https://isaasprods-d87a26cb809c1f43d1f1-endpoint.azureedge.net/blobisaasprods27f2ae9b77/wp-content/uploads/2025/09/agreement-141-organizational-talent-committee-19062025.pdf. All information related to the Board of Directors and Senior Management, Bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>24.4. The Company has a clear function delegation policy approved by the Board of Directors and/or a scheme of authority that makes it possible to know the level of authority of the CEO and the other members of Senior Management.</p>	<p>Yes</p>	<p>March 18, 2002</p>	<p>March 18, 2025</p>	<p>The Corporate Bylaws confer upon the Board of Directors the power to delegate to the Company's CEO any or some of its functions that, in accordance with the law and bylaws, may be delegated. Similarly, this article points out which functions of the Board of Directors are non-delegable in the Senior Management. The Company's CEO, expressly authorized by the Corporate Bylaws, can delegate to the Senior Management the execution of contracts, the authorization of expenditures, and the authorization of payments. See Article 42 of the Corporate Bylaws. In addition, by means of its Resolution 137 of 2025, the Board appointed certain c-suite officers and directors as legal representatives for certain matters and with specific powers, all of which is registered in the commercial registry of the Company and therefore can be seen in the good standing certificate published on the corporate website. All information related to the Board of Directors and Senior Management, the bylaws, regulations, Code of Good Corporate Governance and other corporate governance-related information is published at: https://isa.co/en/isa-group/corporate-governance/ See Certificate of existence and legal representation of ISA https://isa.co/wp-content/uploads/2026/06/certificado-existencia-representacion-legal-isa-junio-2026.pdf</p>
<p>24.5. The Board of Directors, through the Appointments and Remunerations Committee, or whoever performs its functions, annually leads the performance evaluation of the CEO of the Company and is aware of the evaluations of the other members of Senior Management.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>The Organizational Talent Committee, in accordance with its regulations contained in Agreement 141 of 2025, has among its functions to support the Board of Directors in the annual evaluation of the Company's CEO. The annual corporate governance report, which is part of the 2025 Integrated Management Report, will provide information on the evaluation of the CEO conducted by the Board of Directors with the support of the Organizational Talent Committee. Likewise, the Organizational Talent Committee in 2024 reviewed the evaluations of all members of Senior Management. The Integrated Management Report can be consulted at: https://isa.co/en/, see about us, Integrated Management Report of 2025. The agreement of the Organizational Talent Committee can be consulted at: https://isaasprods-d87a26cb809c1f43d1f1-endpoint.azureedge.net/blobisaasprods27f2ae9b77/wp-content/uploads/2025/09/agreement-141-organizational-talent-committee-19062025.pdf</p>

<p>24.6. The Company has a remuneration policy for the CEO and other Senior Management members, approved by the Board of Directors, which identifies all the remuneration components that can be actually paid, depending on the compliance of long-term objectives and risk levels.</p>	<p>Yes</p>	<p>August 30, 2021</p>		<p>All the elements of Recommendation 24.6 are adopted in a document that complies with all the guidelines that define the remuneration components: fixed, variable and benefits, applicable to all levels of the organization, including the CEO and Senior Management and approved by the Board of Directors. This document is a corporate guide with the last update on August 30, 2021.</p>
<p>24.7. If the remuneration of the CEO includes a fixed component and a variable component, its technical design and calculation method prevents that the variable component may exceed the ceiling established by the Board of Directors.</p>	<p>Yes</p>	<p>January 1, 2016</p>	<p>November 25, 2016</p>	<p>The variable remuneration model authorized by the Board of Directors establishes a ceiling for the CEO.</p>
<p>25.1. The Board of Directors is ultimately responsible for the existence of a solid control environment within the Company that is adapted to its nature, size, complexity, and risks, so that it complies with the requirements indicated in Recommendation 25.1.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>In Article 34 of the Bylaws, the responsibilities of this function are delegated to the Board of Directors, which, through its comprehensive risk management policies, promotes the culture of risks and control in the Company. This entity assigns responsibilities to both the Board Committees and Senior Management. The Comprehensive Risk Management Manual, for internal use, clearly establishes the responsibilities according to the RACI framework (responsibility, approval, consultation, and information). The Audit and Risk Committee examines the priority risks for the Company, those that impact strategy, and those that are material to business results at the process level. In addition, pursuant to Board Agreement No. 139 of June 19, 2025, the Board of Directors has defined the functions of the Audit and Risk Committee, entrusting it with the oversight of the management and effectiveness of internal control at ISA and its companies, as well as comprehensive risk management, and assisting the Board of Directors in fulfilling its oversight responsibilities regarding risk management. In the various meetings of the Board of Directors and the Audit and Risk Committee, there is continuous monitoring of the different organizational issues in order to maintain an effective internal control and ensure the proper operation of the Company. All information related to the Board of Directors, the Board Committees, Senior Management, bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>25.2. In the case of Conglomerates, the Parent Company's Board of Directors shall promote the existence of a Control Architecture with a consolidated, formal scope which covers all the subordinate companies, establishing responsibilities with respect to the policies and guidelines on this matter at the Conglomerate level, and defining clear reporting lines that allow a consolidated view of the risks to which the Conglomerate is exposed to, as well as the adoption of control Recommendations.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>The corporate control system, the comprehensive risk management policy, and the policy regarding the statutory auditor or external auditor are approved by ISA's Board of Directors and apply to all of its member companies, in accordance with ISA's general guidelines. ISA's parent company is Ecopetrol (Corporate Bylaws, Paragraph 5, Article 34, Subparagraph 1). The main characteristics of the control system and risk management are published on the corporate website: https://isa.co/en/, section Corporate Control System. The Risk Manual establishes the periodicity and reporting times of each of the companies and determines the risk management relationship and the organizational structure in charge of risk management within ISA and its companies. The different matters discussed by the Board of Directors and its committees demonstrate the periodic monitoring of matters of corporate interest, aiming to maintain an adequate risk management and internal control level. https://isa.co/en/isa/corporate-management-corporate-control-system-2/ https://isa.co/en/isa-group/corporate-management-comprehensive-risk-management/</p>
<p>26.1. In the Company, the risk management objectives are those included in Recommendation 26.1.</p>	<p>Yes</p>	<p>January 14, 2014</p>	<p>June 22, 2023</p>	<p>ISA and its companies have a Comprehensive Risk Management Manual that contains the Comprehensive Risk Management Policy, which has been approved by the Board of Directors. The Policy and Manual establish the risk management methodology applicable to ISA and its companies, the criteria for prioritizing risks, and the frequency of reports to the Audit and Risk Committees and/or Boards of Directors. This establishes the framework for the objective, systematic, and standardized implementation of measures aimed at optimal risk management, with the aim of increasing competitive advantage, ensuring business continuity in the face of the various risks to which the companies are exposed, and preserving the integrity of corporate resources. Regarding risk methodology, the Manual sets forth guidelines for the stages of risk identification, measurement, monitoring, and control. On the corporate website https://isa.co/en/, under the "About Us/Corporate Management/Comprehensive Risk Management" section, you can find information related to risk management at ISA and its subsidiaries. https://isa.co/en/isa-group/corporate-management-comprehensive-risk-management/</p>
<p>26.2. The Company has a risk map, considered as a tool for identifying and monitoring the financial and reputational risks to which it is exposed.</p>	<p>Yes</p>	<p>November 30, 2001</p>	<p>June 19, 2025</p>	<p>ISA has a risk map that is quarterly reviewed by the Audit and Risk Committee. This map identifies the main events that could affect the achievement of the Company's strategic goals or affect its financial and non-financial resources. Board Agreement No. 139 of June 19, 2025, establishes some of the Committee's functions, such as: i. approving the Company's risk profile (risk map) and establishing the indicators for monitoring that profile; ii. to promote the development of a comprehensive risk management model at ISA and its companies that enables the establishment of a risk profile (risk map) consistent with strategic objectives and the monitoring of the extent to which the risks assumed align with this profile; and iii. analyzing and evaluating the Company's day-to-day risk management in terms of prioritization (limits) and the risk profile (risk map), with particular attention to the context, assessment, treatment, and communication of risks, as well as the measures taken to manage them. The map is published on the corporate website: https://isa.co/en/, ISA section, Corporate Management, Comprehensive Risk System, and is part of the Integrated Management Report presented annually to the Shareholders' Meeting.</p>

<p>26.3. The Board of Directors is responsible for defining a risk management policy and for establishing maximum exposure limits to each identified risk.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>August 30, 2024</p>	<p>The Board of Directors approves the comprehensive risk management policy applicable to ISA. The policy is issued based on the statutory functions of the Board of Directors in terms of establishment, orientation, and review of policies for the management of ISA and its companies. The Audit and Risk Committee approved the risk prioritization criteria (limits), which are aligned with the Company's strategic review. This policy is published on the corporate website: https://isa.co/en/, ISA section, Business Management System, Comprehensive Risk Management.</p>
<p>26.4. The Board of Directors is aware of and periodically monitors the Company's actual exposure to the maximum risk limits defined, and proposes corrective and follow-up actions in the event of deviations.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>The Board of Directors has among its functions the follow-up on the Comprehensive Risk and Alarm Management System approved by the Board of Directors. In these follow-up meetings, recommendations or comments regarding the prioritized risks and their management are made. The Audit and Risk Committee monitors the prioritized risks on a quarterly basis. In addition, the Chairman of the Committee reports this follow up to the Board of Directors. This information is also made available to the Board members so they have the information to prepare before the meeting. Board Agreement No. 139, dated June 19, 2025, establishes the Committee's functions as follows: i. to review prioritization levels (risk limits) and monitor risk reports and work plans, making the appropriate recommendations to the Board of Directors, other board committees, and/or management; and ii. analyze and evaluate the Company's day-to-day risk management in terms of prioritization (limits) and risk profile (risk map), paying particular attention to the context, assessment, treatment, and communication of risks, as well as risk management measures. Presentations were made to the Risk Committee on a quarterly basis, covering risks that exceeded the limits set by the company. Information related to risk management can be found in the Integrated Management Report https://isa.co/en/ See Download Center. All information related to the Board of Directors, the Board Committees, Senior Management, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>26.5. Within the framework of the risk management policy, Senior Management is the owner of the processes and is responsible for risk management; that is, for identifying, evaluating, measuring, controlling, monitoring and reporting risks, defining methodologies, and ensuring that risk management is consistent with the strategy, the defined risk policy, and the approved maximum limits.</p>	<p>Yes</p>	<p>January 1, 2014</p>	<p>June 22, 2023</p>	<p>Within the organizational structure, risk management is overseen by the Chief Risk and Compliance Office (Senior Management), which has a Corporate Risk Department to carry out these functions. The Comprehensive Risk Management Manual, which is for internal use within the organization, establishes the RACI framework (Responsibility, Authority, Consultation, and Information) and assigns responsibility for risk management to the company's process owners. By the end of 2025, ISA will have updated risk matrices for the company's processes. Information related to risk management can be found in the Integrated Management Report. https://isa.co/en/ See Download Center.</p>

<p>26.6. The Company has a risk delegation policy approved by the Board of Directors, which establishes the risk limits that can be managed directly by each level in the Company.</p>	<p>Yes</p>	<p>April 23, 2015</p>	<p>June 22, 2023</p>	<p>The Board of Directors, through the Audit and Risk Committee, approved the risk prioritization criteria for ISA and its companies, in August 2024. The comprehensive risk management manual establishes the relationship between prioritization levels and the organizational structure responsible for managing them within ISA and its companies. Risks with an orange or red level (high and very high) are reviewed and followed up by the Audit and Risk Committee. Presentations were made to the Audit and Risk Committee on a quarterly basis, which included risks exceeding the limits set by the company. Information related to risk management can be found in the Integrated Management Report. https://isa.co/en/ See Download Center.</p>
<p>26.7. In the Conglomerates , risk management shall be done at a consolidated level so as to contribute to the cohesion and control of the companies that make up the Group.</p>	<p>Yes</p>	<p>August 30, 2011</p>	<p>February 7, 2022</p>	<p>ISA and its companies comply with the Comprehensive Risk Management Policy through the identification, assessment, and implementation on Recommendations for the management of risks to which they are exposed. Each company has its own risks map and performs its assessment based on the manual established by the Chief Strategy Office to ensure the methodological homologation. In addition, each company monitors the status of its risks and defines and implements Recommendations to improve their management. On a quarterly basis, companies present their progress on their risk management efforts and the main events that have occurred. ISA's Corporate Risk Department consolidates and prioritizes risk events of the Company maps into a single map. All of the above takes into account the general guidelines of Ecopetrol S.A., parent company group to which ISA belongs. ISA publishes the risks map, the most significant events, and the main management Recommendations implemented to mitigate their impact. The role of ISA within the Ecopetrol business group is established in article 5 of the corporate bylaws, available at https://isa.co/en/</p>
<p>26.8. If the Company has a complex and diverse structure of businesses and operations, there is the position of Chief Risk Officer (CRO) with jurisdiction at the Conglomerate level in the case of controlled companies and/or business groups.</p>	<p>Yes</p>	<p>January 1, 2016</p>	<p>December 1, 2023</p>	<p>Risk management is consolidated through the Corporate Risk Department, which is part of the Chief Risk and Compliance Office of ISA, which covers all the companies. The CRO position is assumed by the Chief Risk and Compliance Officer. Formalization of corporate risk management as part of the duties of the Risk and Compliance Officer can be found at: https://isa.co/en/isa-group/isa-talent/ Organization chart</p>

<p>27.1. The Board of Directors is responsible for ensuring the existence of an adequate internal control system, adapted to the Company and its complexity, and consistent with the risk management in place.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>In accordance with the Corporate Bylaws, the Board of Directors is responsible for approving, implementing, and following up the internal control system. The Audit and Risk Committee is responsible for evaluating the internal control system and monitoring risk management, among other functions. In addition, the Board of Directors has a Corporate Governance, Sustainability, Technology, and Innovation Committee, an Organizational Talent Committee, and a Business Committee to address issues related to strengthening internal control at ISA and its companies. The agreements governing the Board of Directors' committees are available on the corporate website, in the corporate governance section: https://isa.co/en/isa-group/board-of-directors/</p>
<p>27.2. The Board of Directors is responsible for monitoring the efficiency and adequacy of the internal control system, which may be delegated to the Audit Committee, without this Board losing its supervision responsibility.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>June 19, 2025</p>	<p>In accordance with the Corporate Bylaws, the Board of Directors plays a fundamental role in approving, implementing, and supervising the internal control system. To do this, the Board of Directors has specifically delegated to the Audit and Risk Committee the duty of monitoring the management and effectiveness of ISA and its companies' internal control system. The Board of Directors gets updates on how this Committee is doing through reports from the Committee Chairman to the Board. During 2024, this Committee held a total of 13 sessions to address in depth these matters. For more detailed information ISA's corporate governance, including the corresponding annual Corporate Governance Report, please consult the Company's website at: https://isa.co/en/, Corporate Governance, Shareholders' Meeting section.</p>
<p>27.3. The Company applies and demands the principle of self-control, understood as the "ability of the people involved in the different processes to consider control as an inherent part of their responsibilities, fields of action, and decision making."</p>	<p>Yes</p>	<p>January 30, 2014</p>		<p>Senior Management encourages and promotes the principle of self-control among employees. Self-control is understood as the ability of the people involved in the different processes to consider control as an inherent part of their responsibilities, fields of action, and decision making; and the culture of risk identification, communication, and management. The control environment provides the foundation for the other control components discussed in title 4 of the Code of Good Corporate Governance. https://isa.co/en/isa-group/corporate-governance/</p>

<p>28.1. The risk culture, philosophy and policies, as well as the approved exposure limits, are communicated downwards and horizontally throughout the Company, so that the entire organization considers the risks and control activities in its business.</p>	<p>Yes</p>	<p>January 30, 2014</p>		<p>Primary group meetings, led by process owners (Senior Management), are used as mechanisms to communicate and provide feedback to all stakeholders on definitions, decisions and events in the organization, including those related to risk and control. These spaces facilitate top-down communication. In 2025, the Risk Management Department held frequent meetings with company executives and risk managers, facilitating horizontal communication. In addition, there are several other channels of communication with various stakeholders that promote the company's risk culture, both horizontally and vertically.</p>
<p>28.2. The Company has a mechanism for reporting information upwards (to the Board of Directors and Senior Management), which is truthful, easy to understand, and thorough, in order to support and enable informed decision making and risk management and control.</p>	<p>Yes</p>	<p>January 30, 2014</p>	<p>April 26, 2022</p>	<p>On a quarterly basis, information on the main risks is reported to the Audit and Risk Committee in accordance with the defined prioritization criteria, following consultation with the executive committees of both ISA and the various companies. Subsequently, the Committee submits a report on its activities to the Board of Directors. In addition, investment and strategic project decisions are presented to ISA's Business Committee or the appropriate sponsor, in accordance with the criteria defined in Annex 5 of Guide 58 (Risk Manual). All information related to the Board of Directors, the Board Committees, Senior Management, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate Governance Report</p>

<p>28.3. The Company's communication and reporting mechanism allows: i. Senior Management to involve the Company as a whole by emphasizing its responsibility for risk management and the definition of controls, and ii. Company personnel to understand their role in risk management and the identification of controls, as well as their individual contribution in relation to the work of other parties.</p>	<p>Yes</p>	<p>January 30, 2014</p>		<p>ISA has upward, horizontal, and vertical mechanisms and forums that enable senior management to understand and support the management of key risks and allow the organization to receive feedback and frequently update its risk profile in line with the development and nature of the business. The Risk Management Manual outlines the role that employees play in risk management and, specifically, in the performance of their duties.</p>
<p>28.4. There are internal anonymous whistleblower hotlines that allow employees to anonymously report illegal or unethical behavior or behavior that may violate the Company's risk management and control culture. Reports on these allegations are made available to the Board of Directors.</p>	<p>Yes</p>	<p>April 11, 2011</p>		<p>The Company has an Ethics Line composed of several channels, such as: toll-free telephone line, e-mail, web form, and application. All these channels are managed by external providers specialized in this activity. These channels allow whistleblowing anonymously or not, depending on the whistleblower's choice. For this reason, the identity of the whistleblower is reserved. In addition, the information is properly treated as confidential and the personal data provided is protected. All its management is defined in a protocol for the management of ethical issues, which is published on the corporate website. The management of the ethics line is permanently reported to the Ethics Committee, to the Audit and Risk Committee, and to the Board of Directors. Likewise, it is included in the Integrated Management Report that will be available on the website when the information of the Ordinary Shareholders' Meeting is published. https://isa.co/en/isa-group/ethics-line/ https://isa.co/en/ ISA section / integrated management report</p>
<p>29.1. In the Company, the Board of Directors, through the Audit Committee, is responsible for overseeing the effectiveness of the various components of the Control Architecture.</p>	<p>Yes</p>	<p>September 30, 2005</p>	<p>June 19, 2025</p>	<p>The Board of Directors has a Corporate Audit Committee, which is generally responsible for overseeing the management and effectiveness of the components of the control framework, including the company's internal controls. Agreement 139, which regulates the Audit and Risk Committee of the Board of Directors, establishes the functions of such Committee. All information related to the Board of Directors, the Board Committees, Senior Management, bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/board-of-directors/</p>

<p>29.2. In the Company, the monitoring work aimed at providing assurance on the effectiveness of the Control Architecture mainly involves the internal auditor in collaboration with the Statutory Auditor in matters within their competence, particularly with regard to the financial information generated by the Company.</p>	<p>Yes</p>	<p>June 12, 2014</p>		<p>The Chief Corporate Audit Office performs the function of internal audit to ensure the effectiveness of the control architecture. The External Auditor or Statutory Auditor is invited to the Audit Committee meetings to present the reports of its review. The Statutory Auditor submitted information during 2025 at the following audit and risk committees: No. 172, 173, 176, 181, 182, 184. The 2025 annual Corporate Governance Report contains information related to the management of the Audit and Risk Committee. https://isa.co/en/isa-group/corporate-governance/ See Download Center - Corporate Governance Report</p>
<p>29.3. The Company's internal audit function has an Internal Audit Statute, approved by the Audit Committee, which expressly states the scope of its functions in this area, which should include the matters indicated in Recommendation 29.3.</p>	<p>Yes</p>	<p>June 12, 2014</p>	<p>October 23, 2018</p>	<p>In compliance with requirement 29.3, the Company's internal audit function has an Internal Audit Statute approved by the Audit and Corporate Risk Committee at its meeting No. 112 in October 2018. This statute establishes and communicates the purpose, authority, and responsibilities defining the framework for the internal audit activities of ISA and its companies. The scope of internal audit functions, as detailed in the statutes, includes the evaluation of risk management, control, and corporate governance processes to ensure that risks are identified and managed appropriately; that financial, administrative, and operational information is reliable, complete, and timely; and that resources are used efficiently and properly protected¹. In addition, quality and continuous improvement in internal control processes are promoted, and compliance with applicable policies, standards, procedures, and laws is ensured. This statute, approved by the Audit and Corporate Risk Committee, ensures that the internal audit function complies with the points outlined in recommendation 29.3, providing a clear and detailed framework for the performance of its activities. https://isa.co/en/isa/corporate-management-corporate-control-system-2/ Downloads - Internal Audit Statute</p>

<p>29.4. The head of internal auditing maintains a professionally independent relationship with the Senior Management of the Company or Group that hires him/her, through his/her exclusive functional dependence on the Audit Committee.</p>	<p>Yes</p>	<p>June 12, 2014</p>	<p>June 19, 2025</p>	<p>The Audit Statute of ISA and its companies establishes the functional dependence of the Chief Corporate Audit Office on the Corporate Audit Committee. Agreement 139 of 2025, which regulates the functioning of the Audit and Risk Committee, details among its functions, recommending to the CEO of the Company the selection or dismissal of the head of the internal audit function. At the same time, it is emphasized that the corresponding compensation must be determined in accordance with established internal procedures for human talent management. This proactive approach underscores the strategic importance of the Committee in the oversight and direction of the internal audit function, thereby reinforcing the foundation of internal governance and control in the organization. All information related to the Board of Directors, the Board Committees, Senior Management, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/board-of-directors/</p>
<p>29.5. In the Company, the appointment and removal of the internal audit manager is the responsibility of the Board of Directors, based on a proposal from the Audit Committee, and his/her removal or resignation is communicated to the market.</p>	<p>N/A</p>			<p>Article 49 of Law 142 of 1994, which establishes the legal regime of ISA as a utility company, indicates that the internal control is responsibility of the management of each utility company. Internal audit fulfills internal control evaluation and monitoring responsibilities delegated by management. Internal audit's functions and organization will be determined by each utility company. Therefore, the appointment of the Internal Auditor is made by the person designated to exercise this responsibility according to law. While the Chief Corporate Audit Officer (Internal Auditor) is appointed by the Company's CEO, this appointment is based on the Recommendation of the Corporate Audit and Risk Committee, as set out in Agreement 139 of 2025. Their appointment, removal or resignation is communicated to the market as relevant information. The Chief Corporate Audit Officer (Corporate Auditor) functionally reports to the Board of Directors through the Audit and Risk Committee. This Committee is responsible for ensuring that Corporate Audit is exercised in an environment of independence and transparency, and provides the necessary resources for this purpose. Likewise, it reports to the Board of Directors the situations that put the above at risk. One of the functions of the Audit and Risk Committee is to recommend the selection or removal of the head of the internal audit function to the CEO, who in turn shall appoint and determine his/her remuneration in accordance with internal procedures for the management of human talent. All information related to the Board of Directors, the Board Committees, Senior Management, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/board-of-directors/</p>

<p>29.6. The Statutory Auditor of the Company or Group maintains a clear independence from them, a condition that shall be stated in the respective audit report.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>February 22, 2023</p>	<p>The statutory auditor expressly declares its independence from ISA and its companies before ISA's Audit and Risk Committee. Additionally, to safeguard the independence of the Statutory Auditor, the Financial Auditor Policy indicates that the Statutory Auditor or External Auditor shall be subject to the disqualifications, prohibitions, incompatibilities and responsibilities established in the applicable laws in each country, and additionally may not be hired for professional services other than those of the financial audit itself and other functions recognized in current regulations. This prohibition extends to persons or entities related to the Statutory Auditor's Firm, which include the companies within its group, as well as companies where there is broad coincidence between their partners and/or administrators and those of the Statutory Auditor or External Auditor firm. In exceptional cases and after verification by the internal auditors, the Audit Committee of the Company interested and the Audit and Risk Committee of ISA, additional auditing services may be contracted. In any case, only additional audit services that do not create conflict of interest or that do not affect the independence of the Statutory Auditor could be contracted. Additional audit services that are contracted shall be reported to the Audit and Risk Committee of the parent company of the Business Group See https://isa.co/en/isa-group/corporate-governance/ Download Center section / Statutory Auditor Corporate Policy</p>
<p>29.7. If the Company acts as a Parent Company of a Conglomerate, the Fiscal Auditor is the same for all companies, including the off-shore companies.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>February 22, 2023</p>	<p>Article 43 of the Corporate Bylaws establishes that, as possible, the Statutory Auditor will be the same for all companies in the Group. ISA is part of the Ecopetrol Business Group. The foregoing is in consideration of the legal provisions applicable in each country that can establish restrictions or special conditions. Additionally, the Statutory Auditor or External Auditor Policy applicable to the business group incorporates this recommendation. See https://isa.co/en/isa/corporate-management-corporate-control-system-2/ https://isa.co/en/isa-group/corporate-governance/ See Download Center - Statutory Auditor Corporate Policy</p>

<p>29.8. The Company has a policy for appointing the Statutory Auditor, approved by the Board of Directors, and disclosed between the Shareholders, which includes the provisions set out in Recommendation 29.8.</p>	<p>Yes</p>	<p>April 24, 2015</p>	<p>February 22, 2023</p>	<p>ISA has a policy in place for the appointment of the Statutory Auditor or External Auditor, applicable to ISA and its companies. Such policy defines the guidelines for the selection, appointment, inabilities and rotation of the Statutory Auditor or the External Auditor, within which the Recommendations established in recommendation 29.8 of the Country Code were adopted. The policy was reported to shareholders and to the market in general via the corporate website. The Fiscal Auditor's policy is set forth in the Code of Corporate Good Governance. All information related to the Board of Directors, the Board Committees, Senior Management, bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>29.9. To avoid excessive links between the Company and the Statutory Auditor's firm and/or its teams and to maintain its independence, the Company establishes a maximum contract term of between five (5) and ten (10) years. In the case of the Statutory Auditor, who is a natural person not linked to a firm, the maximum contract term is five (5) years.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>February 22, 2023</p>	<p>The Bylaws and the Corporate Policy of the Statutory Auditor establish a maximum permanence term of 10 years, promoting the rotation of the firm's partner assigned to the Company and its work team no later than 5 years after the beginning of the term. See Article 43 of the Corporate Bylaws. All information related to the Board of Directors, the Board Committees, Senior Management, bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>

<p>29.10. Within the maximum contracting term, the Company promotes the rotation of the partner and work teams of the Statutory Auditing firm assigned to the Company in the middle of the period, and at the end of the period the rotation of the firm is mandatory.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>February 22, 2023</p>	<p>The Corporate Bylaws recommend the rotation of the partner of the firm assigned to the Company and its team after a maximum of 5 years from the beginning of the period. See Article 43 of the Corporate Bylaws. Likewise, it is established in the Corporate Policy of the Statutory Auditor. See: https://isa.co/en/isa-group/corporate-governance/ Download Center - Statutory Auditor Corporate Policy / Corporate Bylaws. All information related to the Board of Directors, the Board Committees, Senior Management, Bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>29.11. In addition to the current prohibition of contracting with the Statutory Auditor professional services other than those related to the financial audit and other functions recognized in the current legislation, the Company extends this limitation to persons or entities related to the Statutory Auditor's firm, which include the companies of its group, as well as companies in which there is a significant coincidence between the partners and/or administrators and those of the Statutory Auditor's firm.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>February 22, 2023</p>	<p>The Statutory Auditor or External Auditor Policy published on the corporate website and referenced in the Code of Good Governance establishes that the Statutory Auditor or External Auditor shall be subject to the disqualifications, prohibitions, incompatibilities and responsibilities established in the applicable laws of each country and may not be hired for professional services other than financial audit and other functions recognized in the regulations in force. This prohibition is applicable to persons or entities related to the Statutory Auditor firm, which include companies within its group, as well as companies in which there is a wide coincidence of its partners and/or administrators with those of the Statutory Auditor's firm or External Auditor. In exceptional cases and after verification by the internal auditors, the Audit and Risk Committee of the Company interested and the Audit and Risk Committee of ISA, additional auditing services may be contracted. In any case, only additional audit services that do not create conflicts of interest or that do not affect the independence of the Statutory Auditor may be contracted. Additional audit services that are contracted shall be reported to the Audit and Risk Committee of the parent company of the Business Group. See https://isa.co/en/isa-group/corporate-governance/ Download Center - Statutory Auditor Corporate Policy</p>

<p>29.12. In its public information, the Company discloses the total amount of the contract with the Statutory Auditor as well as the proportion that the fees paid by the Company represent in relation to the total revenues of the Statutory Auditor.</p>	<p>No</p>			<p>ISA publishes the total value of the contract entered into with the Statutory Auditor in the proposals presented at the General Shareholders' Meetings. The proportion representing the fees paid by the Company compared with the total income of the firm is not published, since this information has not been provided to ISA, nor has ISA been authorized to disclose it. https://isa.co/en/isa-group/general-shareholders-meeting/ See Shareholders' Meeting History</p>
<p>30.1. The Board of Directors has approved a disclosure policy, which includes, at least, the information covered by the Recommendation.</p>	<p>Yes</p>	<p>November 15, 2001</p>		<p>Title 5 of the Code of Good Corporate Governance contains the information disclosure policy. The Code of Good Corporate Governance approved by the Board of Directors is available on the website, Corporate Governance section. Additionally, there are Corporate Guidelines to disclose public information of ISA and its companies to control and authority entities, investors, and corporate and mass media, as well as an institutional Guide applicable to ISA in particular, which defines criteria and procedures for the delivery of information based on the provisions of Recommendation 30.1. https://isa.co/en/isa-group/corporate-governance/ See Code of Good Corporate Governance</p>

<p>30.2. In the case of the Conglomerates, the disclosure of information to third parties is comprehensive and transversal, covering the group of companies, which allows external third parties to form a well-founded opinion on the reality, organization, complexity, activity, size, and governance model of the Group.</p>	<p>Yes</p>	<p>March 27, 2014</p>	<p>February 7, 2022</p>	<p>ISA is part of the corporate group whose parent company is Ecopetrol S.A. Article 5 of ISA's Bylaws establishes the role of ISA within the Group, which is: to be in charge of the organization, supervision and strategic coordination of the companies in which ISA has a direct or indirect majority shareholding and in those in which ISA has the capacity to influence management decisions; disseminating or implementing, as the case may be, the policies, strategies, guidelines, and general directives of the Group's parent company, taking into account the characteristics and singularities of the countries and/or businesses in which such companies participate. In line with the above, ISA has Corporate Guidelines for the disclosure of public information of ISA and its companies to control entities and authorities, investors, and the corporate and mass media. In addition to the ISA's structure, business and policies, complete information about ISA and its companies can be found on the corporate website. Also, the website provides access to ISA's corporate reports, detailing not only its situation, but also the status of each of ISA's company, relationally. In addition, the corporate website announces that it is part of the Ecopetrol Group and there is a link to consult the information of the Group or Business Group. All information related to the Board of Directors, the Board Committees, Senior Management, the Bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>31.1. In the event of any reservations in the Statutory Auditor's report, these and the actions proposed by the Company to remedy the situation shall be the subject of a pronouncement by the Chairman of the Audit Committee to the shareholders at the General Meeting.</p>	<p>Yes</p>	<p>September 30, 2005</p>	<p>December 14, 2018</p>	<p>In accordance with paragraph 3 - Right to information, clarifications and questions, of title II of ISA's Code of Good Governance, the following is indicated: When, in view of the reservations or emphasis of matter paragraphs of the Statutory Auditor, the Board of Directors considers that it should maintain its criterion, this stance will be adequately explained and justified by means of a written report to the General Meeting, specifying the content and scope of the discrepancy. There were no discrepancies with the emphasis of matter paragraphs presented by the Statutory Auditor in their report to the Ordinary Shareholders' Meeting of 2025: Ver https://isa.co/en/statutory-auditors-report/ - consolidated statutory auditor's report https://isa.co/en/isa-group/corporate-governance/ Downloads section - Code of Good Corporate Governance</p>

<p>31.2. When, in view of the reservations and/or paragraphs of emphasis of the Statutory Auditor, the Board of Directors considers that it should maintain its criterion, this stance will be adequately explained and justified by means of a written report to the General Meeting, specifying the content and scope of the discrepancy.</p>	<p>Yes</p>	<p>March 18, 2002</p>	<p>December 14, 2018</p>	<p>In accordance with paragraph 3 - Right to information, clarifications and questions of title II of ISA's Code of Good Governance, it is indicated that when, in view of the reservations or emphasis paragraphs of the Statutory Auditor, the Board of Directors considers that it should maintain its criterion, this stance shall be adequately explained and justified in a written report to the General Shareholders' Meeting, specifying the content and scope of the discrepancy. There were no discrepancies with the emphasis of matter paragraphs presented by the Statutory Auditor in their report to the Ordinary Shareholders' Meeting of 2025. See https://isa.co/en/statutory-auditors-report/ - consolidated statutory auditor's report . All information related to the Board of Directors, Board Committees, Senior Management, Bylaws, regulations, Code of Good Corporate Governance and other information related to ISA's corporate governance is published at: https://isa.co/en/isa-group/corporate-governance/. See also Integrated Management Report presented to the Shareholders' Meeting at: https://isa.co/en/isa-group/general-shareholders-meeting/.</p>
<p>31.3. Transactions with or between Related Parties, including transactions between companies of the Conglomerate that, by means of objective parameters such as size of the transaction, percentage of assets, sales, or other indicators, are classified as material by the Company, are included in detail in the public financial information, in addition to the mention of off-shore transactions.</p>	<p>Yes</p>	<p>March 27, 2015</p>	<p>December 4, 2021</p>	<p>Aligned with ISA's commitment to promote the adoption of good corporate practices in the Group to reinforce investor confidence, corporate efficiency, transparency, and compliance with commitments to stakeholders, Corporate Guideline No. 77 was published in December 2020 so that related-party transactions at ISA and its companies are carried out at market prices and conditions, respecting the rights of the Companies' shareholders and creditors, contributing to the achievement of strategic goals of the Group, and complying with the law. Similarly, in the notes to the financial statements to be submitted to the Ordinary General Shareholders' Meeting, the disclosures of the transactions indicated in Recommendation 31.3 shall be made. See Integrated Management Report at: https://isa.co/en/</p>

<p>32.1. In the framework of the information disclosure policy, the Board of Directors (or the Audit Committee), adopts the necessary Recommendations to ensure that all the financial and non-financial information of the Company required by the legislation in force is transmitted to financial and capital markets, as well as all that information deemed relevant for investors and customers.</p>	<p>Yes</p>	<p>July 31, 2015</p>		<p>The follow-up on the Company's financial statements is carried out by the Board of Directors on a monthly basis. The Audit and Risk Committee annually pre-approves the financial statements to be presented to the Board of Directors and submitted for approval by the general meeting of shareholders. The Audit and Risk Committee verifies that the preparation, presentation, and disclosure of the Company's financial information is adjusted to legal provisions and oversees the compliance with all internal standards and procedures of the Company. In addition, Senior Management develops specific procedures to ensure the timely, consistent, and accurate provision of public information, so that the Company's financial and non-financial information is prepared, presented, and disclosed in accordance with current regulations. All information related to the Board of Directors, the Board Committees, Senior Management, bylaws, regulations, Code of Good Corporate Governance, and other information related to the corporate governance of ISA is published at: https://isa.co/en/isa-group/corporate-governance/</p>
<p>32.2. The Company's website is designed to be user-friendly, so that it is easy for the user to access the information related to Corporate Governance.</p>	<p>Yes</p>	<p>January 30, 2007</p>	<p>February 11, 2021</p>	<p>The ISA website offers the best practices of communication and transparency of information with stakeholders, while providing an appropriate user experience. This digital asset is constantly monitored for proper management, from the technical and content layer, which allows: - Having a flexible, modern, interactive, and usable asset. - Multisite and responsive browsing. - Having cloud infrastructure with the required availability and security. - Maintaining the best practices of information transparency valued by the market. - Creating and improving conversation formats with audiences. - Contributing to digital positioning. - Implementing improvements and efficiencies in administration processes and times. - Incorporating practices to have an accessible website.</p>

<p>32.3. The corporate website includes, at least, the links referred to in Recommendation 32.3.</p>	<p>Yes</p>	<p>July 1, 2014</p>	<p>February 11, 2021</p>	<p>The ISA website has a main menu that incorporates Recommendation 32.3.1. ISA and its companies: Information about the Company, history, corporate governance, Shareholders' Meeting, corporate governance and ethics 2. Sustainable Value: Strategy, environmental management, social management, and stakeholder relations 3. Business: Expanded information on the business model and the impact of the business units 4. Investors; information and tools for shareholders and investors to learn more about the Company, its financial indicators and results, ESG aspects, relevant information, share performance and frequently asked questions, among others 5. Mucho que contarte (We've got a lot to tell you): press releases, publications, media contacts and information of value to website users. About ISA https://isa.co/en/ Shareholders and Investor Relations; share price, capital, relevant events, financial information, management report, General Shareholders' Meeting, etc. https://isa.co/en/investors/ https://isa.co/en/investors/shareholder-service/ Corporate governance information https://isa.co/en/isa-group/corporate-governance/ Sustainability https://isa.co/en/sustainable-value/</p>
<p>32.4. The supporting documents used by the Company to communicate information to the markets are printable, downloadable and sharable.</p>	<p>Yes</p>	<p>January 30, 2014</p>		<p>Documents used to communicate information to the market through the corporate website can be printed, downloaded, and shared: https://isa.co/en/investors/relevant-information-news/</p>

<p>32.5. If the Company is a large and complex business, it publishes annually on its website a report explaining the organization, methods, and procedures of the Control Architecture implemented in order to provide correct and secure financial and non-financial information and safeguard the entity's assets and the efficiency and security of its operations. The information on the Control Architecture is complemented by a risk management report.</p>	<p>Yes</p>	<p>March 27, 2014</p>		<p>The Company presents annually in its Integrated Management Report, which is published on the corporate website, its economic and financial results during the last fiscal year. This report indicates that the internal control system of ISA and its companies is based on the COSO international standard, the way in which Corporate Auditing systematically evaluates internal control systems in accordance with international auditing principles and practices. The integrated management report includes the integrated risk management report and is prepared pursuant to the methodology of the International Integrated Reporting Council (IIRC) and the new Global Reporting Initiative (GRI) standard, which are mandatory. It corresponds to the period from January 1 to December 31 and is annual. https://isa.co/en/, ISA section, Integrated Management Report</p>
<p>33.1. Each year, the Company prepares a Corporate Governance Report, which content is the responsibility of the Board of Directors, subject to review and favorable opinion of the Audit Committee, to be presented together with the rest of the year-end documents.</p>	<p>Yes</p>	<p>March 30, 2005</p>		<p>ISA presents annually to the General Shareholders' Meeting the Company's Corporate Governance Report that is part of the Integrated Management Report, which is published on the corporate website, ISA Management Reports. In the course of its role of ensuring compliance with policies, the Code of Good Corporate Governance and other codes of conduct adopted by the Company, the Corporate Governance, Sustainability, Technology, and Innovation Committee reviews and gives its opinion to the Board of Directors, who is responsible for its approval according to functions established in the bylaws. The annual Corporate Governance Report shall be published with the information of the Ordinary Shareholders' Meeting. https://isa.co/en/isa-group/general-shareholders-meeting/</p>
<p>33.2. The Company's Annual Corporate Governance Report is not a mere transcription of the Corporate Governance standards included in the Bylaws, internal regulations, codes of good governance, or other corporate documents. Its purpose is not to describe the Company's governance model, but to explain the reality of its operation and the relevant changes during the period.</p>	<p>Yes</p>	<p>March 30, 2005</p>	<p>March 27, 2015</p>	<p>The Annual Corporate Governance Report reports the compliance with the Company's corporate governance standards, as well as the relevant changes during the fiscal year. It is available at: https://isa.co/en/, ISA section, Corporate Governance, Shareholders' Meeting. The Corporate Governance Reports for each annuity can be found in this section. https://isa.co/en/isa-group/corporate-governance/</p>

<p>33.3. The Company's Annual Corporate Governance Report contains year-end information describing the manner in which the Corporate Governance recommendations adopted by the Company were complied with during the year and the main changes that occurred. The structure of the Company's Corporate Governance Report is aligned with the structure established by Recommendation 33.3.</p>	<p>Yes</p>	<p>March 27, 2015</p>		<p>The Annual Corporate Governance Report covers all proposed topics to be addressed in Recommendation 33.3 of the Country Code and the regulations on disclosure of information applicable to issuers of securities, which is available on the website: https://isa.co/en/, Corporate Governance, Shareholders' Meeting. https://isa.co/en/isa-group/corporate-governance/</p>
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