



Supplier Code of Conduct for ISA and its Companies

ISA and its companies manage their supply chain under ethical, human rights, labor, environmental, and anti-corruption criteria across all operations. In this regard, ISA engages its suppliers and their value chain, reinforcing the concept of an extended enterprise and strengthening the business ecosystem.

Accordingly, this document constitutes the Supplier Code of Conduct for ISA and its companies. It is aligned with our higher purpose, “CONNECTIONS THAT INSPIRE,” and its guiding principles, which define how we think, act, and operate. This Code complements the Code of Ethics and Conduct, the Anti-Corruption and Anti-Bribery Guidelines, the Corporate Governance Code, and our Stakeholder Commitments.

We are an energy company that fosters transformative connections to accelerate the energy transition. This challenge is framed within the Energy Trilemma, which requires balancing supply security, equitable access, and environmental sustainability. Through “Energy that Powers the Transition,” we define the essence of our 2040 strategy: using energy as a transformative force, placing people and the planet at the center, and leading the transition toward a sustainable future.

Through these instruments, ISA and its companies reaffirm their commitment to comply with and promote environmental, social, and governance (ESG) principles across their value chain, encouraging suppliers to do the same.

Scope

This Code applies to ISA and its subsidiaries and establishes the minimum non-negotiable standards that all suppliers must adhere to when entering into contractual relationships with ISA and its companies.

Awareness of and compliance with this Code is a prerequisite for contracting. By accepting contractual terms, suppliers commit to complying with the provisions set forth herein.

Labor Conditions and Human Rights

ISA and its companies are committed to fair operating practices and to respecting and promoting human rights across all activities, including those carried out by suppliers. Accordingly, suppliers are required to:

- **Promote a work environment based on respect**, ensuring safe and healthy working conditions while minimizing occupational risks.
- **Implement all necessary measures to protect the health and safety of employees and third parties** operating on their premises. This includes identifying, assessing, and mitigating



workplace hazards through effective preventive and protective measures, in compliance with applicable laws and international standards, and ensuring the highest standards to safeguard life and personal integrity.

- **Provide working conditions that support work-life balance**, promoting practices that respect employees' rest periods, recreation, and family life.
- **Recognize, respect, and protect the right to freedom of association and collective bargaining**, without discrimination or retaliation against those who participate in such activities, in accordance with applicable national and international regulations.
- **Prevent and address all forms of violence, harassment, or abuse in the workplace**, including physical, sexual, psychological, or moral harassment, abuse of authority, or any conduct that creates an intimidating, hostile, or offensive environment.
- **Reject all forms of discrimination** based on gender, race, color, beliefs, religion, age, nationality, marital status, social class, political opinion, sexual orientation, or disability.
- **Prohibit child labor, forced labor, and any form of labor exploitation.**
- **Explicitly prohibit the use of child labor across operations and the supply chain**, ensuring compliance with minimum age requirements established by national legislation and applicable international standards, and implementing reliable mechanisms to verify the age of workers.

Environment

ISA and its companies are committed to protecting the natural environment and managing their environmental impacts. Suppliers are therefore encouraged to:

- Implement **environmental management systems**, where applicable, to ensure continuous improvement and promote sustainable and efficient use of natural resources.
- Measure its **carbon footprint and adopt effective mechanisms for the reduction and offsetting of greenhouse gas (GHG)** emissions. In particular, the supplier undertakes to measure its GHG emissions (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆); and optimize its energy consumption.
- Protect biodiversity by minimizing impacts on ecosystems and actively supporting conservation efforts.
- **Reduce the consumption of natural resources** through responsible and efficient operational practices.



- Promote **circular economy** practices through initiatives aligned with the “5Rs”: Reduce, Reuse, Recycle, Recover, and Repair.
- Develop internal awareness campaigns on **environmental protection**.
- Adopt climate change mitigation and adaptation strategies, including periodic GHG measurement and concrete reduction actions.
- Properly manage **hazardous substances and waste**, ensuring safe handling, transport, storage, recycling, reuse, and disposal, in compliance with environmental regulations.
- Identify and properly **manage hazardous substances, waste, and materials**, ensuring their safe handling, transportation, storage, recycling, reuse, and final disposal. These actions shall be aimed at preventing and minimizing pollution, promoting material circularity, and ensuring compliance with applicable environmental regulations.

Ethics and Transparency

ISA and its companies operate under strict ethical and transparency standards, as established in their Corporate Ethics and Compliance Program. Suppliers are required to:

- Comply with ISA’s Ethics and Compliance Program and promote these principles within their own organizations and supply chains.
- Conflicts of Interest. The Supplier shall act with transparency, independence, and integrity in its dealings with ISA and its affiliates. Accordingly, it shall refrain from participating in any situation, relationship, connection, or interest of a personal, family, professional, commercial, corporate, or economic nature that may give rise to an actual, potential, or perceived conflict of interest, or that may compromise, or appear to compromise, the objectivity, independence, or transparency of its actions. The Supplier undertakes to fully, truthfully, and promptly disclose any situation of this nature that exists or arises during its relationship with ISA and its affiliates, including those involving its ultimate beneficial owners, shareholders, partners, directors, legal representatives, employees, contractors, or third parties acting on its behalf or representation.
- Ensure proper handling of information, particularly confidential data and personal information.
- Guarantee the protection, integrity, and ethical use of information in compliance with applicable data protection laws.
- Use artificial intelligence (AI) in an ethical and responsible manner. We promote the timely and responsible implementation of AI solutions. While its benefits are recognized, this technology must be used in a responsible, secure, and ethical way, with full respect for human rights, which may be impacted by its use.



Prevention of Fraud, Corruption, and Bribery

Suppliers must actively prevent corruption in all forms, including extortion and bribery, whether domestic or international. They are required to:

- Comply with all applicable laws and regulations, as well as with any standards to which the supplier has voluntarily adhered, aimed at preventing, controlling, and managing the risks of corruption, fraud, bribery, money laundering, terrorism financing, the proliferation of weapons of mass destruction, and related misconduct.
- Maintain relationships based on institutional respect and transparency.
- Act with integrity and transparency in interactions with public officials. Suppliers shall not offer, promise, authorize, or provide any financial or non-financial benefit, directly or indirectly (including through third parties), to public officials in order to obtain an improper advantage or exert undue influence.
- Refrain from using ISA, its companies, or any related business relationship to engage in unlawful acts, including those associated with corruption, fraud, bribery, money laundering, terrorism financing, the proliferation of weapons of mass destruction, or related offenses.
- Avoid engaging with third parties known, or reasonably suspected, to be involved in illicit activities, including corruption, fraud, bribery, money laundering, terrorism financing, or related misconduct.
- Take appropriate legal action in response to any such misconduct, while refraining from initiating legal actions on behalf of, or in representation of, ISA or its companies unless expressly authorized.
- Promptly inform ISA and its companies of any known or suspected risks or incidents related to corruption, fraud, bribery, money laundering, terrorism financing, the proliferation of weapons of mass destruction, or related matters, including involvement in administrative or judicial proceedings. Suppliers shall take all reasonable measures to prevent the escalation of such risks.
- Explicitly prohibit all forms of corruption, including (but not limited to) domestic and transnational bribery, facilitation payments, fraud, extortion, collusion, and money laundering. Suppliers shall not offer, promise, give, or authorize any undue benefit—directly or indirectly—to public officials or third parties for improper advantage.
- Reject all forms of opacity (lack of transparency) in processes, decisions, or information, recognizing that such practices undermine trust and hinder informed decision-making.
- Protect and promote free and fair competition, ensuring that business practices are conducted ethically, fairly, and transparently. Suppliers shall not engage in anti-competitive practices such as collusion, abuse of market dominance, or unfair competition.



- Ensure that their employees act with integrity and transparency in all interactions related to ISA and its companies.
- Refrain from offering, promising, authorizing, or providing any undue benefit, directly or indirectly, to public officials or third parties in order to obtain improper advantages.

Reporting Through Ethics Channels

Suppliers must report any conduct that violates ethical principles or the commitments outlined in this Code through ISA's ethics channels.

Cooperation with Authorities and Investigations

All parties subject to this Code must cooperate transparently in internal and external investigations related to potential violations, as well as report such conduct to the appropriate authorities.

Enforcement Mechanisms

This Code is supported by the following instruments:

- Code of Ethics and Conduct
- Anti-Corruption and Anti-Bribery Guidelines
- Corporate Human Rights Guidelines
- Occupational Health, Safety, and Environmental (HSE) Manuals

ISA and its affiliates may verify compliance with this Code through different mechanisms and at any stage of the contractual process, including the pre-contractual, contractual, and post-contractual phases, as applicable. This Code shall be periodically reviewed and updated in accordance with business needs.

In addition to the provisions set forth in this Code, Suppliers shall comply with all criteria and standards of conduct established in the applicable laws and regulations of each country where ISA and its affiliates operate.

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GABRIEL MELGUIZO POSADA

First Alternate Legal Representative

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