

 PROMIGAS	ENVIRONMENTAL POLICY	
Version: 5	Code: PNA-1754	Status: V
Prepared by: Luz Elena Alean Vera	Reviewed by: Lucía Ruiz Martínez	Approved by Natalia Abello
Position: Environment professional	Position: Sustainability and Environment Manager	Position: Legal and Sustainability Deputy Chairperson

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1. PURPOSE

Establish corporate guidelines to ensure the contribution of Promigas and its related companies to sustainable development, based on the implementation of best environmental management practices and the improvement of the environmental performance of the activities carried out, in line with the Principles of the Global Compact and the Sustainable Development Goals.

2. SCOPE

This Policy applies to all current and future activities, facilities, and projects of Promigas and all related companies over which Promigas has control or operational control.

In companies not operated or controlled by Promigas, our commitment is to exercise our influence, to the best of our abilities, to motivate them to act consistently and coherently with our policies.

It includes the phases of design; construction; operation; maintenance; closure and dismantling of gas infrastructure, renewable energy, and electricity; location repairs; energy services; and other services provided by companies directly or through contractors. It also applies to activities carried out along with stakeholders in the value chain

3. DEFINITIONS

Not applicable

4. GENERAL TERMS

The Environmental Policy conveys the commitment undertaken by Promigas S.A. E.S.P. and its related companies to ensure an operation responsible with the environment and with its different stakeholders and constitutes a guideline for all the activities towards the development of the business affairs.

The Environmental Policy is governed by the Promigas Corporate Policy, in compliance with the strategic objectives and material issues of the integrated management model with a sustainable

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approach, defined in the Corporate Strategic Configuration (GLA-168). In line with the Code of Conduct GNA-755, the Human Rights Policy PNA-1895, and the decision to contribute from our work to achieve the Sustainable Development Goals included in the UN 2030 Agenda.

5. CONTENT

5.1 ENVIRONMENTAL POLICY

Promigas is committed to implement the highest environmental management standards to ensure that its activities are conducted by identifying, avoiding, minimizing, controlling and, in those cases where is not possible, restoring and compensating the possible impacts of its operations on the environment by applying the mitigation hierarchy in order to achieve, to the extent possible, the preservation of biodiversity.

In accordance with the foregoing, Promigas is committed to contributing to sustainable development and the generation of economic, social and environmental value to society, based on the conservation of the environment and contribution to humankind well-being, in strict compliance with environmental legislation and the voluntary principles embraced such as the principles of the Global Compact and the United Nations Climate Care initiative and the Sustainable Development Goals, for which it has expressed its decision to contribute to the achievement of the goals of the global agenda.

In compliance with this commitment, it establishes that all actions undertaken by Promigas and its affiliated companies, contractors and suppliers of significant goods and services to achieve compliance with the environmental policy, shall fulfill the following guidelines:

- ✓ To comply with the environmental legislation applicable to our activities and the environmental commitments agreed upon with our clients
- ✓ To guarantee preservation of strategic ecosystems, minimizing the layout of new projects in declared environmental protection zones, prioritizing the passage through areas already intervened and reducing impact on environment and biodiversity.
- ✓ To implement measures and goals to prevent, minimize, restore and compensate for the potential environmental and social impacts that may be generated by the activities, products and services of current operations, as well as those generated by the development of new businesses or by the acquisition of new projects, considering the perspective of life cycle, carbon

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footprint management, integral management of waste, preservation of biodiversity and the alignment to the circular economy strategy, using products, technologies and procedures that contribute to this purpose.

- ✓ To promote and strengthen a culture of care for the environment, the rational use of resources, the prevention and minimization of impacts on the environment, protection of biodiversity and mitigation of climate change among stakeholders, especially employees, contractors and other members of the value chain.
- ✓ To disclose or train in a timely manner our employees and contractors with the guidelines for the improvement in environmental performance and compliance with the policy, to improve the understanding of the impact of their activities on the environment and society and incorporate good management practices that include the best way to avoid, mitigate, restore and compensate them.
- ✓ To implement actions to reduce and reuse solid waste in our activities.
- ✓ To select goods and services suppliers committed to compliance with environmental legislation, the adoption of best environmental practices in their distribution and logistics chains and the implementation of actions to minimize environmental and social impacts during their services provision, all this through HSE plans, a requirement established in the HSE manual for suppliers (PME-913).
- ✓ To evaluate the environmental performance of our activities (own or suppliers') in order to ensure compliance with commitments, avoid deviations from standards and identify opportunities for continuous improvement regarding environmental performance.
- ✓ To apply environmental due diligence in any procurement process or in making strategic decisions for participation in new businesses, in order to guarantee knowledge of the environmental risks and impacts resulting from new businesses and define the measures to be implemented to bring them to the environmental standards established by the organization.
- ✓ To communicate to our stakeholders and mainly to the communities in the regions where we operate, the environmental impacts and the result of our environmental management and performance

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5.2 OUR COMMITMENTS

5.2.1 COMMITMENT TO BIODIVERSITY

We incorporate biodiversity conservation as a criterion from the early stages of project planning and design and during projects elaboration, operation, maintenance, closure and dismantling and we are committed to the implementation of the following actions within the mitigation hierarchy, to ensure no net loss of biodiversity resources and achieve zero net deforestation in all projects in our area of influence:

- a. Avoid, during the design phase, avoid routes determination and new projects location in protected or strategic areas for the conservation of biodiversity. Therefore, we have define the following measures within the commitment:
 - ✓ Do not conduct activities within protected areas listed in IUCN Category I-IV.
 - ✓ Avoid the installation of infrastructure and operations within national protected areas. In cases where declarations of areas are submitted after the development of projects, joint actions shall be established with the environmental authorities to ensure that appropriate conservation measures are conducted.
 - ✓ The development of an environmental diagnosis of alternatives to define the best projects layout and location, as well as the best elaboration method to ensure the least environmental impact and enhance the positive impacts on biodiversity.
 - ✓ The prioritization in the use of areas or corridors already intervened, for the location of new projects or for expansion or modification of existing ones.
 - ✓ The development of environmental impact studies, identifying the main ecosystems, habitats and species and categories of threats according to the International Union for Conservation of Nature (IUCN), their value and importance in biodiversity, the impact generated and the delimitation of the areas of intervention, as well as the definition of prevention measures, management and protection, restoration and compensations to reduce biodiversity loss.
- b. Minimize interventions during projects elaboration, operation and maintenance, through:

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✓ Implementing actions that aim to avoid deforestation, reduce tree felling, especially in key areas of biodiversity, acquisition of products from sources with forest certification, among others. ✓ Taking measures to ensure the conservation of biodiversity, such as implementing wildlife passage in areas of biological corridors, shooping, and rescue and relocation (including nests) of species of fauna and flora. ✓ Controlling and monitoring service providers' compliance with the provisions of this policy in the development of infrastructure construction or maintenance activities and action in accordance with the best environmental practices. ✓ Evaluating the impact of activities through biodiversity monitoring and other actions to ensure the effectiveness of the measures implemented for the conservation of Biodiversity. ✓ Reducing natural resource intervention areas in the right-of-way of existing networks that cross areas that are now protected by IUCN Category I-IV while conducting infrastructure maintenance activities.

c. Repair or restore intervened areas.

- ✓ The restauration of the intervened soil, reusing the removed plant organic material to foster natural regeneration.
- ✓ The restoration of the intervened areas with shrub and tree species compatible with the environment and that do not pose a threat to the biological diversity of the area to be revegetated.

d. Make effective compensations in strategic ecosystems against significant and negative residual impacts that could not be avoided, minimized or rehabilitated and that aim at biodiversity prevalence, through:

- ✓ The implementation of compensation plans for biodiversity loss and land use change and non-deforestation.
- ✓ The expansion of nature reserve areas and support for the preservation of existing biodiversity in the areas of operation.
- ✓ Participation, on a voluntary basis, in biodiversity conservation projects, work in alliances and joining efforts with private entities, authorities, unions or universities and other organizations, seeking to maximize results in the actions undertaken and guarantee the care of biodiversity, enhance the generation of knowledge and contribute to position the importance of biodiversity care as a strategic element for the countries of operations.

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- ✓ The contribution to the restoration of the protected areas of the region where we operate, aligned with the environmental management plans of the protected areas or the plans of the environmental authorities.
- ✓ The participation of communities in actions to protect and care for biodiversity, supporting economic development activities seeking to reduce pressure on the use of natural resources and promoting the conservation of ecosystems.

5.2.2 COMMITMENT TO CLIMATE CHANGE

We are aware that climate change is one of the main environmental, social, economic, political and ethical challenges that the world has to face as well as of this phenomenon consequences on a large part of global ecosystems.

Aware of the relationship of Promigas' businesses with the issues arising from climate change and aware of the risks and opportunities arising therefrom, Promigas is committed to minimizing the risks generated by its activities and enhancing opportunities in the development of the business strategy and management model with a focus on sustainability in which environmental responsibility and the climate component play an important role.

We are committed to being carbon neutral in our scope 1 and 2 by 2040 and to achieve a 50 % reduction in the intensity of our emissions compared to those of the base year 2021 for scopes 1, 2, as well as with the adaptation of our infrastructure to climate events, with the awareness of stakeholders to the challenges posed by climate change and with the search for new growth opportunities that allow to consolidate a sustainable company. For this we shall plan:

- ✓ The periodic review and updating of the Climate Strategy of PROMIGAS and its affiliated companies. Therefore, we are committed to developing an Action Plan that: (1) allows to achieve the objectives established in such strategy, (2) defines goals based on scientific and sector studies, and its verification mechanisms, and (3) binds Promigas and its affiliated companies
- ✓ Our carbon footprint measurement and certification under ISO 14064
- ✓ The development of an Emissions Reduction Plan that allows achieving the goals of reducing greenhouse gas (GHG) emissions, promoting our business efficiency, competitiveness and sustainability.

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- ✓ The design and deployment mechanism of an internal carbon pricing (ICP) model, aimed at sensitizing decision makers about the vulnerability of new investments to current or potential climate regulations.

Our climate strategy includes the following lines of action:

- Mitigation Strategy
- Adaptation Strategy
- Communications Strategy
- Sustainable Growth Strategy, including an analysis of climate change scenarios and risks and opportunities

5.3 RESPONSIBILITIES

The Environmental Policy shall be administered in Promigas by the Sustainability and Environment Management, who will lead its implementation, control, surveillance, monitoring and continuous improvement. It shall be updated according to changes in the Strategic Planning and Top Management guidelines or at least every 3 years in compliance with the Document Management Standard GNA-002-S1. Any changes to the Policy shall be reviewed and approved in accordance with Annex 1 of the Policy Management Standard GNA-769.

It is the responsibility of each of the companies to implement the necessary actions for the fulfillment of this policy, as well as the communication and dissemination of its contents through appropriate means so that it will be known at all levels and by internal and external stakeholders.

All employees are responsible for implementing the guidelines of this policy, as well as the actions derived for its compliance. Any concerns about its content and commitments shall be forwarded to your immediate supervisor or policy administrator.

6. REFERENCE DOCUMENTS

- GNA-002 S1 "Norma de Administración de Documentos"
- GNA- 769 "Norma para la Administración de Políticas"
- GLA -168. "Corporate Strategic Configuration"