

Environmental and Social Review Summary (ESRS) GASES DE OCCIDENTE BRILLA – COLOMBIA

Original language of the document: Spanish
Date of issuance: September 2026

1. General Information on the Operation

This transaction (the “Operation” or the “Transaction”) consists of the purchase of accounts receivable of up to 200,000 million Colombian pesos (“COP”), to be sold by Gases de Occidente S.A. E.S.P. (“GdO,” the “Client,” or the “Company”). Under the Transaction, GdO agrees to sell (and IDB Invest agrees to purchase) eligible accounts receivable originating from the Brilla financing program, which the Client offers to its customers for the purchase of products and services such as: (i) construction materials for home improvements; (ii) residential natural gas connections; (iii) energy-efficient appliances, including stoves and refrigerators; and (iv) computers, among others.

2. Scope of IDB Invest’s Environmental and Social Review

The environmental and social analysis of the proposed operation consisted of a documentary review of the Client’s Environmental and Social performance over time, with an emphasis on compliance with the following Performance Standards (“PS”): PS1: Assessment and management of environmental and social risks and impacts; and PS2: Labor and working conditions; PS1: Resource efficiency and pollution prevention; and PS4: Community health and safety.

3. Environmental and Social Classification and Justification

In accordance with IDB Invest’s Environmental and Social Sustainability Policy, the operation has been classified as Category C because: (i) the incremental impacts it will generate are nonexistent or immaterial; (ii) the proceeds from the operation will be used solely to provide liquidity to the Client by acquiring the accounts receivable portfolio from its “Brilla” user financing program; and (iii) the funds from the Transaction will not be used to finance any type of Capital Expenditures (“CAPEX”).

Based on an analysis conducted in accordance with the IDBG Group’s Paris Agreement Alignment Implementation Approach, the Project is considered aligned with the Paris Agreement.

4. Environmental and Social Risks

4.1 Assessment and Management of Environmental and Social Risks and Impacts

The Client has implemented and maintains an Environmental Management System (“EMS”) that: (i) has a structure described in the EMS Manual; (ii) incorporates the identification and assessment of aspects and impacts, legal requirements, risks and opportunities, operational and controls, monitoring, performance evaluation, and continuous improvement; (iii) incorporates corporate

environmental management programs, efficient use of water and energy, integrated waste management, biodiversity, and Greenhouse Gas management; and (iv) applies to its administrative and operational activities, as well as to contractors and third parties. The EMS is certified by the Colombian Institute of Technical Standards (“ICONTEC”) under Colombian Technical Standard NTC ISO 14001:2015. It has also developed an Occupational Health and Safety Management System (“OHSMS”) in accordance with local regulations, with the objective of providing adequate working conditions and promoting the prevention of occupational hazards for workers; and it has adopted the following policies that guide its environmental, social, and OHS performance: (i) Human Rights; (ii) Environment; (iii) Road Safety; iv) Diversity, Equity, and Inclusion; and v) Human Capital.

The Company manages the requirements for its forest use and watercourse occupancy permits through an “Environmental Permits and Licenses Matrix” that is part of the EMS. Similarly, it relies on an Environmental Risk Matrix to identify risks associated with its operations, as well as: (i) operational risks (leaks, spills, fugitive emissions); (ii) regulatory risks; (iii) reputational risks or environmental noncompliance; and (iv) climate risks. The management of these and other related risks is carried out through the following EMS programs: (i) Corporate Environmental Management; (ii) Efficient Energy Use and Conservation; (iii) Efficient Water Use and Conservation; (iv) Comprehensive Waste Management; (v) Biodiversity; and (vi) Greenhouse Gases.

The Company has 12 professionals responsible for implementing the EMS and managing OHS and labor issues, distributed across three areas: (i) Sustainability, consisting of a Corporate Affairs Manager, a Sustainability Manager, a Sustainability Specialist, an Environmental Specialist, and a Junior Sustainability Specialist; and (ii) Health and Safety (“OHS”), comprising an Operations Manager, a Head of Industrial and Process Safety, a Senior Occupational Health and Safety Specialist, a Senior Process Safety Specialist, a Safety Assistant, and a Process Safety Technician.

The Client’s Contingency Plan identifies the risks associated with its operations (distribution and sale of natural gas, and generation and distribution of photovoltaic electricity) and establishes guidelines and responsibilities for the implementation of emergency preparedness and response plans, aimed at the Company’s personnel, support entities, and the community. These documents establish: (i) the identification and valuation of threats and vulnerabilities; (ii) alert levels and responsibilities for minor, moderate, and severe incidents; (iii) standardized operational plans for fires, explosions, earthquakes, floods, terrorist attacks, assaults, and aggressive individuals; (iv) administrative and operational response teams; (v) drills, training, and equipment inspections; and (vi) coordination with external support groups. Risks and threats are updated annually, and the plans are revised whenever changes occur at the Company’s locations.

The Client uses digital media to disseminate information about its operations and Environmental and Social OHS issues, including: (i) the corporate website; (ii) YouTube channels; (iii) LinkedIn; (iv) Instagram; and (v) Facebook. It also has an HSEQ Communications Matrix that defines the topics, audiences, objectives, media, and frequency of internal and external communications, and includes campaigns on emergencies, road safety, Occupational Health and Safety, psychosocial risks, efficient use of water and energy, waste, biodiversity, climate change, and legal requirements.

4.2 Employment and Working Conditions

Colombian labor and occupational safety and health (OSH) legislation, governed by the 2025 Labor Reform (Law 2466 of 2025), seeks to foster a fair, equitable, and sustainable work environment by balancing the rights and responsibilities of employers and workers. This includes regulations on working hours, minimum wages, vacations, and leave, as well as specific rules governing contracts, the formalization of employment relationships, job security, gender equality, and mechanisms for dialogue between employers and workers.

Colombia is a founding member of the International Labor Organization (“ILO”) and actively participates in the international system of labor standards. The country has ratified several ILO conventions, such as Convention No. 155 (which addresses occupational safety and health) and Convention No. 187 (a framework for promoting occupational safety and health), as well as landmark conventions such as Convention No. 29 on forced labor.

Colombian law sets the minimum working age at 15, as well as ensuring that prior authorization is obtained from the competent authority and the comprehensive protection of the adolescent worker is guaranteed. For workers between the ages of 15 and 18, it establishes the following conditions as well as restrictions: (i) a prohibition on performing work that is hazardous, unhealthy, performed at night, or that could compromise their moral character; (ii) specific limits on working hours based on age group; and (iii) the requirement that their work not interfere with their school attendance.

The Client complies with labor and occupational safety and health (OSH) requirements through an Occupational Health and Safety Management System (“OHSMS”), certified by ICONTEC under ISO 45001:2018 for the design, construction, operation, and maintenance of natural gas transportation and distribution systems. Its management tools include epidemiological surveillance systems for musculoskeletal and psychosocial risks, as well as a procedure for productive return to work applicable to direct and temporary employees with health conditions of general or work-related origin.

The Company’s Human Resources Policy includes: (i) guidelines to prevent workplace and sexual harassment; (ii) commitments to promote equal employment opportunities; (iii) compensation policies; (iv) protocols for the termination of employment contracts; (v) occupational health standards and policies; (vi) epidemiological surveillance systems; and (vii) disciplinary sanctions.

The Client has a Diversity, Equity, and Inclusion Policy with the objective of promoting the employability of diverse groups and underrepresented minorities in the workplace. The policy specifically outlines a “zero-tolerance” commitment to any act of discrimination and defines the reporting channels, the investigation process, and administrative sanctions.

The client currently has 1,960 employees, 375 of whom are direct hires. Women account for 28% of the total workforce and 42% of direct hires.

4.3 Resource Efficiency and Pollution Prevention

The client implements the following management programs as well as its EMS: (i) Efficient Water Use and Conservation, which includes monthly monitoring of consumption, inspection and maintenance of water and sanitation systems, leak repair, awareness campaigns, and water-saving devices; (ii) Energy Conservation, through monthly monitoring of consumption, preventive maintenance of equipment and facilities, efficiency measures, and internal campaigns; (iii) comprehensive management of non-hazardous waste, hazardous waste, waste electrical and electronic equipment (“WEEE”), and construction and demolition waste (CDW), including source separation, temporary storage, record-keeping, delivery to authorized waste management operators, and traceability through to final disposal; (iv) management of chemicals in accordance with the Globally Harmonized System, including pre-acceptance evaluation, safety data sheets, labeling, compatibility matrices, and spill controls; (v) biodiversity, including application of the mitigation hierarchy, controls for fauna, flora, and water bodies, and offsets where applicable; and (vi) Greenhouse Gases, through annual inventories, monitoring of direct and indirect emissions, and reduction measures. The EMS also establishes monitoring of indicators, inspections, audits, and corrective and improvement actions.

4.4 Community Health and Safety

The Client’s Emergency Prevention, Preparedness, and Response Plan assesses the risks that its operations may pose to health and safety—whether of natural or human origin—as well as the vulnerability of people, resources, systems, and processes. For administrative and customer service locations, the plan addresses scenarios such as fires, explosions, earthquakes, floods, terrorist attacks, assaults, aggressive individuals, and other events that could affect service continuity. The Company also has specific procedures in place for incidents involving chemicals, fuel and odorant spills, and the handling of hazardous waste.

To prevent and manage these risks, the Company implements controls throughout the design, construction, operation, and maintenance of its projects, including: (i) threat and vulnerability analyses; (ii) standardized operational plans; (iii) administrative and operational response teams; (iv) training, drills, and simulations; (v) inspection and maintenance of alarms, fire extinguishers, first-aid kits, and other response equipment; (vi) evacuation routes and plans; and (vii) coordination with external support groups. The procedures assign responsibilities to the Safety and Operational Excellence, Operations, Administrative Services, Physical Security, Customer Service, and Communications departments, depending on the type and severity of the incident.

The Comprehensive Waste Management Plan includes¹ measures to prevent communities from being exposed to hazardous waste during its storage, transport, and final disposal.

¹ For example, it establishes controls for waste segregation, labeling, internal movement, temporary storage, transportation, and delivery to authorized waste management companies. The Company verifies the licenses and permits of these waste management companies, maintains manifests and final disposal certificates, and conducts follow-up assessments and audits to ensure the traceability of waste.

5. Proposed Management Measures

Since the Client's sustainability reports evidence that the management measures contained in the EMS plans and programs are being implemented as expected and are achieving the intended objectives, this operation does not require additional management measures.

6. Additional Information

For questions about the Project, please contact Gases de Occidente.

Name:	Gloria Liliana Ceballos
Title:	Head of Sustainability
Phone number:	3133996370
Email:	gloriacm@gdo.com.co

For questions and comments regarding IDB Invest, please contact:

Name:	IDB Invest Communications Group
Email:	requestinformation@idbinvest.org

Additionally, as well as a last resort, affected communities may access the IIC's Independent Consultation and Investigation Mechanism (MICI) as follows:

Phone number:	+1 (202) 623-3952
Fax number:	+1 (202) 312-4057
Address:	1300 New York Ave. NW, Washington, DC, USA 20577
Email:	mecanismo@iadb.org or MICI@iadb.org