

TGS Whistleblower Policy



TGS is committed to creating an environment where employees and contractors (collectively “Employees”) feel comfortable and confident to ask questions, seek advice and raise concerns within the company. This policy outlines a procedure for Employees to report actions that an employee suspects violates the TGS Code of Conduct, a law, or any other regulation, and how TGS manages any reports received.

If an Employee suspects that an Employee or TGS has engaged in any action that violates the TGS Code of Conduct, any applicable law, regulation, or any other action that constitutes a fraudulent practice, the employee is expected to immediately report such information. TGS recognizes that raising potential issues is not always easy, and therefore, TGS has provided several avenues for you to report concerns:

- **Notify your manager** or your manager’s supervisor if you become aware of any activity you think is a violation of the Code of Conduct or applicable law;
- **Contact TGS’ Compliance Department** via email (compliance@tgs.com), phone, or in-person;
- **Report your concern**, anonymously if preferred, to the TGS Hotline which is available here: www.tgs.ethicspoint.com.

Employees will be trained on this policy and TGS’ prohibition against retaliation in accordance with this policy.

All reports will be followed up promptly and be assessed for urgency and risk level and, when necessary, any immediate actions will be taken in order to prevent an incident occurring or to reduce any material consequences of an incident.

If determined necessary, an investigation will be conducted under the Compliance Department’s supervision and any requisite stakeholders will be informed. TGS expects its Employees to cooperate in the investigation of suspected violations. The Compliance Department will not, to the extent practical and appropriate under the circumstances and the law, disclose the identity of anyone who reports a suspected violation or who participates in an investigation. Once the investigation has concluded, the Compliance Department, along with any other relevant departments, will determine a recommended course of action, if any. We emphasize the importance of reporting because failure to report criminal activity can itself be understood as condoning the crime. Failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report.

TGS will not tolerate any form of retaliation directed against any person who raises a concern in good faith or who cooperates in any related investigation or proceeding about a possible violation of the Code of Conduct or the law, even if the report does not turn out to be an actual violation. Any threat or act of retaliation against TGS Employees will be treated as a serious violation of the Code of Conduct. Acting in good faith means that you have made a sincere report in a responsible manner through any of the channels listed above.

All reports made, along with any related information, will be kept strictly confidential in accordance with applicable laws and TGS policies. Any personal data collected as part of a report will be processed in accordance with the TGS Privacy Policy. Relevant documentation that must be shared with the Board of Directors for the purposes of compliance reporting will be anonymized unless otherwise required under applicable laws. All documentation will be appropriately archived in accordance with applicable law and internal policy.