
	GUIDE TO THE HUMAN RIGHTS RISK MANAGEMENT CYCLE		
	Corporate Responsibility Management Corporate Institutional Relations and Communications Department		
	Code GEE-G-042	Prepared on 30/12/2025	Version: 3

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1. PURPOSE

To provide guidelines that steer the management of Human Rights (hereinafter, HHRR) risks in the Ecopetrol Group¹ (hereinafter, the EG), through the definition of key concepts and considerations for planning the due diligence cycle, which includes the identification, assessment, treatment, monitoring and reporting of HHRR risks. This is in line with the guidelines of the Ecopetrol Group's Integrated Risk System, the highest national and international standards on HHRR, and the expectations of Stakeholders² (SH).

2. DEVELOPMENT

2.1 Scope

The Corporate Institutional Relations and Communications Department (RRC) of Ecopetrol S.A. (hereinafter Ecopetrol or the Company), through the Corporate Responsibility Management (GRT), is responsible for governing HHRR matters within the EG. In fulfillment of this function, and in accordance with Responsible Business Conduct standards³, it develops guidelines that steer proper HHRR due diligence, for application by the EG's controlled companies to which this Guide is applicable.

The Guide to the HHRR Risk Management Cycle (hereinafter the Guide) defines the criteria and process through which these risks are identified, assessed, treated and monitored, under the principle of due diligence established in international and national standards⁴.

Given that HHRR matters are cross-cutting to the Company's management and relevant to all its SH, this Guide is normative in nature and applies to all departments, processes and systems of the EG's controlled companies⁵.


¹ The Ecopetrol Group consists of all subsidiaries and affiliated companies, as well as those entities in which Ecopetrol holds an equity interest, both in Colombia and abroad.

² In 2023, Ecopetrol updated its stakeholder groups. To date, there are 11 groups, namely: i) Partners, ii) employees, iii) shareholders and investors, iv) customers, v) suppliers and their workers, vi) media and opinion leaders, vii) the government, viii) communities, iv) the scientific and academic community, v) civil society and cooperation organizations, vi) subsidiaries.

³ Responsible business conduct (RBC) means that all companies, regardless of their legal form, size, ownership structure, or sector, prevent and address the adverse consequences of their operations, while contributing to the sustainable development of the countries where they operate. See: <https://mneguidelines.oecd.org/RBC-LAC-scope-and-activities-Spanish.pdf>

⁴ In accordance with the Human Rights and Business Guide of Ecopetrol S.A. (GEE-G-035), due diligence is understood to imply a set of interrelated activities to identify adverse impacts, prevent and mitigate them, monitor the implementation of these processes and results, and report on how adverse impacts are addressed with respect to the companies' own activities, their supply chains and other business relationships.

⁵ This document applies to companies directly controlled by Ecopetrol S.A. and its subsidiaries. The terms "Ecopetrol", "we", "our" or the "Company" refers to these companies. Other Ecopetrol Group companies may be guided by or implement these guidelines.

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The HHRR risk management cycle must be applied in those systems, processes or activities⁶ in which there is a propensity to negatively or positively impact the SH community, employees, retirees and their beneficiaries, contractor supplier employees, or other Human Rights holders⁷.

2.2 Normative References

The Human Rights Guide states that Ecopetrol adheres to and observes, among others, the following international standards:

- International Bill of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- Ten Principles of the Global Compact
- Declaration of the International Labour Organization on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- Voluntary Principles on Security and Human Rights
- ILO Convention 169
- Performance Standards of the International Finance Corporation (IFC)
- Women's Empowerment Principles
- Global Standards of Conduct for the Protection of LGBTI Persons in Business
- Guide for Business on the Rights of Persons with Disabilities
- Convention on Biological Diversity
- United Nations General Assembly Resolution 76/300 on the Human Right to a Clean, Healthy and Sustainable Environment

All of these standards contain a series of guidelines that help steer business conduct in HHRR matters, across different fields and with different population groups. However, in order to identify HHRR risks and impacts, it should be noted that Ecopetrol is committed to respecting all internationally recognized HHRR, as set out in the International Bill of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights), which may be consulted at:


<https://www.ohchr.org/SP/ProfessionalInterest/Pages/CoreInstruments.aspx>.

2.3 Definitions

2.3.a Human Rights Risks

⁶ This HHRR risk cycle must always be applied to "disaster scenarios", according to the criteria defined in the Guide for Process Risk Management and Dynamic Risk Management Model (DRM) - HSE-G-034, described as follows: • Scenarios with the potential to generate multiple fatalities of persons not involved in the operation and that may exceed the capacity of regional emergency services, or • Loss of containment scenarios with the potential to generate intense, serious and widespread environmental impacts, and which, given the hazardousness of the substances involved, require complex environmental recovery processes, or • Loss of containment scenarios in transport pipelines (crude oil or refined products) that may compromise the supply of vital services for more than three (3) days in at least one municipality classified as special, first or second category (Law 1551 of 2012), or • Loss of containment scenarios requiring evacuation of more than 400 households (approximately 1,240 persons) for more than five (5) days, or • Loss of containment failure scenarios in offshore operations resulting from a loss of well control (blow-out) • Loss of containment scenarios at river and coastal ports that may generate intense, serious and widespread environmental impact, due to the hazardousness of the substances involved and the difficulty of controlling the emission source.

⁷ The explicit mention of these stakeholder groups is made due to their status as HHRR holders, without implying that activities or processes involving other stakeholder groups, such as partners, shareholders or investors, supplier companies, customers, media and opinion leaders, the scientific or academic community, or the State, are not subject to this risk management cycle.

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HHRR risks are particular in that they refer to situations in which one or more HHRR of rights holders (every person, group of persons, and the environment) may be affected as a direct or indirect consequence of business activities, and not to situations that may affect the company's performance. "Human rights risks of a company are understood as the risks that its activities may lead to one or more adverse consequences on human rights."⁸

The United Nations Guiding Principles on Business and Human Rights (UNGPs) distinguish between "reals" and "potentials" impacts on HHRR. An actual impact is one that has occurred or is occurring. A potential impact is one that may occur but has not yet done so. Actual impacts require mitigation and remediation, while potential impacts –or HHRR-related risks– require the adoption of preventive measures to prevent their materialization, or at least to mitigate their severity.⁹

HHRR risks may be identified at any of the risk management levels established in the Integrated Risk Management System, namely: strategic, tactical and operational. At the first two levels, their identification and monitoring is the responsibility of the Corporate Compliance Department. At the operational level, all Company areas are responsible for observing this guideline, and the GRT is responsible for supporting their identification for proper management.

2.3.b HHRR Due Diligence

Due diligence is conceived as "a continuous management process that a prudent and reasonable company must carry out, considering its circumstances, to meet its responsibility to respect Human Rights"¹⁰. To this purpose, the actual or potential risks facing the company must be identified and assessed to determine their adverse consequences on the effective enjoyment of rights. These may arise from the operational context, business activities or business relationships.

Due diligence is closely linked to the particularities of the company's operational contexts, since the characteristics of the environment may increase the severity and likelihood of impacts. It should be noted that the volatility of these circumstances may lead to greater risk to one or another right, which makes it necessary to establish monitoring processes to determine changes in the management plans for identified situations. The UNGPs establish that companies may be involved in HHRR adverse impacts through different modalities:


- Cause: through their own activities
- Contribution: through their activities indirectly.
- Linkage: through entities with which the company maintains a business relationship and which are linked to its operations or products.

For a due diligence exercise to be successful, it must, in addition to carrying out a periodic assessment of risks and impacts, generate and strengthen the processes for integrating the results obtained, as well as strengthening its follow-up strategies and communicating the management carried out. For this reason, it should not be regarded as a mere checklist but as a management process to which adequate technical and financial resources must be allocated for its implementation.

⁸ United Nations. Office of the High Commissioner for Human Rights. Interpretive Guide. The Corporate Responsibility to Respect Human Rights. 2012. Available at: [1242258_HR_PUB_12_02_SPA.pdf \(acnudh.org\)](http://www.acnudh.org/1242258_HR_PUB_12_02_SPA.pdf), P.8.

⁹ Ibid. P. 19.

¹⁰ United Nations. Office of the High Commissioner for Human Rights (2012). *The Corporate Responsibility to Respect Human Rights. Interpretive Guide*, Page 7. Available at: http://www.acnudh.org/wp-content/uploads/2013/08/HR.PUB_12.2_sp.pdf

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2.4 Roles and Responsibilities

The management of HHRR risks in the EG companies is framed within the leadership and commitment of the Board of Directors, the President and the Senior Management Committees. The Board of Directors, the President, the lead area of the Integrated Risk Management System, the Corporate Responsibility Management as the HHRR risk administrative area, and the areas that manage them, are assigned supervisory, execution and reporting responsibilities.


All those responsible for HHRR risk management within the organization are required to apply the provisions of this document, within the principles, framework and risk management process established by the Integrated Risk Management System.

Bearing in mind that the EG has committed to respecting HHRR, that its workers must act consistently therewith, and that HHRR risks may arise in any of Ecopetrol's and its Group's operations, it is the responsibility of everyone in the organization to be aware of the HHRR risks to which rights holders are exposed in connection with the work they perform and the processes in which they participate, in order to manage them properly.

The organizational structure of each company must clearly define the roles and responsibilities for HHRR risk management.

For the case of Ecopetrol S.A., the following roles and responsibilities are set forth:

AT ECOPETROL	RESPONSIBILITIES
<ul style="list-style-type: none"> • Board of Directors • Corporate Governance and Sustainability Committee • Presidency 	<p>Communicate the commitment to respecting HHRR through the following actions:</p> <ul style="list-style-type: none"> • Adopt a public commitment or declaration of respect for HHRR. • Be aware of and monitor the management of HHRR risks at the strategic and process levels. • Ensure that the variable of non-impact on HHRR is considered in the definition of the organization's strategic risks.
Risk Management Department	Ensure that the guidelines defined for risk management at its levels - strategic, tactical and operational - are aligned with the definitions of the Integrated Risk Management System.
Corporate Responsibility Management	<ul style="list-style-type: none"> • Ensure the implementation of the HHRR risk management methodology described in this document. • Provide the necessary resources for applying the HHRR risk identification, assessment and treatment methodology. • Review and monitor the risk management measures. • Design, implement and manage the HHRR Risk Management Cycle for the EG. • Define the guidelines for the HHRR risk management cycle and update them as necessary, in accordance with international standards.

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	<ul style="list-style-type: none"> • Provide ongoing support in the implementation of the HHRR risk management cycle.
Areas that manage risks	Carry out the actions described in this document related to identification, assessment, treatment and reporting, through the technological tool designated for this purpose.

2.5 Process

In accordance with the Integrated Risk Management System – IRS and the single risk management cycle, for this specific case, this document describes the particularities of HHRR risk management in the following stages:

1. Communicate

This phase consists of the exchange of information with stakeholders for the understanding of the risk, as well as obtaining information and feedback for its supervision and decision-making, considering different viewpoints.


The UNGPs suggest that HHRR due diligence processes involve meaningful participation of potentially affected groups and other stakeholders, in order to understand the concerns of individuals whose rights may be potentially impacted by the company's activities.

Given that these are risks associated with the potential adverse impact on HHRR, it is important that those responsible for applying this risk management cycle consult at this stage with internal sources¹¹ that may identify potential HHRR impacts on members of Ecopetrol's SH (direct workers or contractor workers, communities, among others) in the context of its own activities or other business relationships with partners or suppliers.

It is also recommended that the Corporate Responsibility Management or the area acting in its capacity as the entity responsible for the process of identifying HHRR risks and impacts, conduct a review of secondary sources to deepen the understanding of the situation in the zones or processes under analysis. These consultations should focus not only on the collection of qualitative information, but also quantitative information through official sources, to understand the social and environmental contexts in which the operation takes place¹². Its application will help in obtaining preliminary information and building a stakeholder map relevant to the exercise.

¹¹ Sources that may be consulted include the Citizen Participation Office, the Corporate Responsibility Management and the community engagement, environmental and legal teams, among others.

¹² Since the information must be based on historical and current facts, it is suggested to consult sources such as: the Ombudsman's Office, the National Statistics Department (DANE), the National Planning Department (DNP), National Police Criminal Statistics (PONAL), the Early Warning System; the National Center for Historical Memory (CNMH); the Memory and Conflict Observatory; the HHRR and IHL Observatory of the Presidential Council on HHRR; the Thematic Rapporteurs Program of the Universidad de Los Andes; independent think tanks; sectoral reports (e.g. UNICEF reports on children's rights); internal and external experts, from the areas, processes or systems that apply the cycle.

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In accordance with the principle of a 'differentiated approach'¹³ defined in the HHRR and Business Guide (ECP GEE-G-035), it is important to consider that in particular contexts certain groups of people¹⁴ may be vulnerable and therefore it is necessary to determine whether, due to their condition, they may be particularly affected by operations or business relationships.

2. Plan

All activities carried out by Ecopetrol are subject to HHRR risk analysis, insofar as HHRR risks may arise at any phase of the life cycle of a project or operation; they may arise in the execution of any cross-cutting process of the company (e.g. organizational talent, environmental licensing) or system; and they may arise in commercial activities carried out with partners, customers, and in the supply chain, whenever they may impact rights holders.

In this regard, the following aspects should be considered:

2.1. Assessment of Internal Capabilities

The capabilities to identify, assess, mitigate and remediate the potential HHRR impacts that may be caused in connection with direct or indirect operations shall be assessed, with the aim of advancing the delimitation of the aspects mentioned below.

2.1.1. Responsible Party

Each area shall have a team or officer responsible for carrying out and/or coordinating the identification of HHRR risks and impacts for direct and indirect operations and for establishing the corresponding prevention and mitigation measures, jointly with other areas as required. They shall report on the status of risks and the effectiveness of controls to the appropriate party, according to the information indicated in Table 5. "Management Responsible Party according to Risk Assessment".

2.2. Timeliness


Without prejudice to the technical stages of each project, system or process, continuous and periodic activities shall be carried out¹⁵ for the identification and updating of HHRR risks before, during and at the close thereof, so as to ensure comprehensive management of risks that may materialize. In any event, risk monitoring shall be carried out at least once a year.

2.3. Scope

¹³ Differentiated approach: The EG respects the rights of persons belonging to groups or populations that may be particularly vulnerable to adverse impacts on their HHRR. In the conduct of its business activities, it will apply the differentiated approach to prevent, mitigate or remediate such impacts. Components of the differentiated approach include the gender, ethnic, origin and sociocultural characteristics, disability, reconciliation, sexual orientation and age approaches, and all those considered in Ecopetrol's Human Wealth Policy. Of particular note is Ecopetrol's commitment to safeguarding the rights of children and adolescents as subjects of differentiated attention.

¹⁴ Examples: women, landless persons, migrant workers, nomadic populations, indigenous communities, persons with disabilities, displaced populations, refugees, LGBTIQI persons, children and adolescents, human rights defenders, and persons living with HIV/AIDS. Taken from: IPIECA, *Human Rights due diligence guidelines* (May, 2021), P. 13.

¹⁵ The UNGPs do not establish a specific periodicity for conducting due diligence exercises. UNGP 17 states that "it must be a continuous process, since human rights risks may change over time, depending on the evolution of operations and the operational context of companies". However, international sustainability benchmarks such as the *Dow Jones Sustainability Index* establish as a best practice conducting them at least once every three (3) years.

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HHRR risks that may be generated by directly developed operations must be identified, assessed and mitigated. Likewise, those that are developed with partners or through contractor allies.

It is important that the Company be able to identify situations in which there could be complicity or facilitation of irregular activities by any direct worker, or by any of its contractors or partners. This is in order to carry out the corresponding internal investigations and take actions as warranted.

2.5.a Identify

The identification of HHRR risks must be carried out periodically regardless of the phase of projects or activities and, in any case, at least every two years. Risk identification must be based on the best available information, both internal and external, that accounts for circumstances in which the HHRR of rights holders may be adversely impacted in connection with business activities or other business relationships.

As a starting point regarding external information, it is suggested to have the following relevant information:


- a. Characterization of the area and operation (if applicable to the analysis)
 - I. Relevant demographic data (number of inhabitants, age and gender distribution, ethnic presence, educational level, among other aspects)
 - II. Historical context (HHRR, armed conflict), social and economic (e.g. level of unmet basic needs, economic development, employability, conflict dynamics, environmental conflicts, previous presence of activities in the area, among others).
 - III. Institutional capacity (e.g. institutional presence at local and national levels)
- b. Characterization of the process (if applicable to the analysis)
 - I. Responsible Parties
 - II. Supporting information
 - III. Inputs and outputs
 - IV. Involved parties, beneficiaries, etc.
- c. Identification of relevant actors (communities in the area, social organizations, international organizations in the area, entity representatives, etc.).

Given that one of the analytical inputs consists of the perceptions, expectations or concerns of rights holders, it is suggested to identify those actors and groups in vulnerable situations with respect to whom it is important to establish potential HHRR adverse effects and differentiated treatment actions, i.e. actions that take their condition into account.

According to international HHRR standards, it is important to consider that this risk identification should not only take into account those risks that may be directly generated by the company, but also those in which its activity contributes to exacerbating the risk or those to which it is linked. The foregoing is aimed at establishing adequate prevention or mitigation measures adjusted to the company's capabilities, which is why it is important to understand the causes of certain HHRR risks as well as the competent institutions that can support risk management.

d. Previous exercises

The information collected in previous baseline surveys, audits, context analyses or HHRR risk analyses that

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may be relevant for identification and assessment shall be taken into account.

2.5.a.1. Research Methodology

The information gathered by the responsible team or officer, with the support of the GRT, will be useful for applying the various HHRR risk identification methodologies, as detailed in the Integrated Risk Management System guidelines.

Given the nature of the risks to be identified, it is suggested to conduct brainstorming exercises with areas responsible for managing territorial transformation (community engagement, ethnic populations), environment (environmental impacts, climate change, water management), supply chain (labor conditions, real estate management, physical security), human talent (labour practices, union matters) and ethics & compliance.¹⁶

It is also suggested that focus groups, surveys and interviews be conducted with the relevant stakeholders identified, in order to ascertain their perceptions, grievances and concerns regarding human rights issues that are directly or indirectly related to the presence of operations in the area. To this purpose, adequate information management must be ensured.

Consultation with experts and external sources is also useful for carrying out the exercise.

Additionally, the standard risks described in the annex to this Guide may be considered as input.

2.5.b Assess

In assessing operational HHRR risks, it is necessary to consider the SEVERITY variable and the PROBABILITY variable.

2.5.2.1. SEVERITY: this corresponds to the seriousness of the consequences that may be caused if an HHRR risk materializes. In the United Nations Guiding Principles, severity is defined in terms of scale, scope and irremediable character.


2.5.2.2. SCALE: through this attribute, the degree of violation that could occur or has occurred regarding a right is established, and how it affects the individual's dignity and ability to exercise other rights. It addresses the seriousness of the impact that may be caused to the enjoyment of one or more HHRR.

Some useful criteria for determining the scale of the impact refer to the degree of impact and the type of rights that could be involved; the level of company involvement in generating the risk and the vulnerability of the individuals or groups impacted due to particular conditions, e.g. age, social condition, or being recognized as a group in a vulnerable situation by the legal system.

2.5.2.3. SCOPE: this characteristic refers to the number of persons affected or who may be affected in their rights.

To determine the scope, it is useful to consider criteria such as the duration of the impact (short or long term, permanent); the frequency of the impact (constant, occasional, eventual); number of persons affected (particular number of persons affected, groups of persons); geographical scope of the impact (local, regional,

¹⁶ The topics mentioned herein are merely illustrative.

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international)¹⁷.

2.5.2.4. IRREMIABLE CHARACTER: this attribute considers the limitation of the ability to restore the affected party or parties to a situation equivalent to that which existed before suffering the adverse consequences.

In this regard, one of the key questions to answer is whether, once the risk has occurred and the impact has been generated, it is possible to restore rights holders to the same state they were in before the impact.

Severity may be assessed at the corporate or project level, as part of an impact assessment, or as a response to an incident or emergency.

For risk assessment, the use of the following assessment criteria table is suggested¹⁸:


Table 1. Assessment Criteria

Criteria	Rating		
	1	2	3
Scale			
Level of impact on rights holders' rights.	Minor impact on human rights (due to its remediable character).	Potential and/or moderate impact on rights to which Ecopetrol must give special consideration according to its HHRR Guide ¹⁹ .	Imminent impact on one or multiple rights to which Ecopetrol must give special consideration according to its HHRR Guide.
Level of company involvement	Rights impacts are generated due to the context in which the company operates.	Impacts are generated as a direct or indirect consequence of business and context.	Impacts are generated primarily as a consequence of business operations.
Impacts on the rights of populations in vulnerable conditions	No impacts on the rights of populations in vulnerable conditions (women, children, indigenous peoples, Afro-descendants, etc.) are identified.	Actual and potential impacts on the rights of populations in vulnerable conditions (women, children, indigenous peoples, Afro-descendants, etc.) are identified.	Serious and irremediable actual and potential impacts on the rights of populations in vulnerable conditions (women, children, indigenous peoples, Afro-descendants, etc.) are identified.
Scope			
Number of persons affected	A limited and small number of persons is affected relative to	A moderate number of persons is affected relative to the total	The entire population of the area of influence is affected.

¹⁷ IPIECA, *Human Rights Due Diligence Guide*, p. 21.

¹⁸ The assessment table was built using as input the assessment table used by the Fundación Ideas para la Paz in risk analyses conducted for some of Ecopetrol's operations, as well as other company-specific inputs.

¹⁹ List of human rights to which Ecopetrol has stated it pays particular attention within the framework of its management: the right to life, the right to personal integrity, the right to personal freedom, freedom of association and collective bargaining, the right to decent, favourable and adequate working conditions, preventing forced and child labour, the right to health and safety at work, children's rights, the right to equality and non-discrimination, the right to freedom of expression, the right to information, the right to privacy and protection of personal data, the right to indigenous peoples' participation through prior consultation, and collective and environmental rights.

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	the total population of the area of influence.	population of the area of influence.	
Number of rights-affected persons belonging to a population in a vulnerable condition	No persons or groups in a vulnerable condition are affected.	Among the affected persons, there are members of groups in vulnerable situations.	Groups in vulnerable situations are primarily affected.
Irremediable character			
Prevention, mitigation and remediation actions	Addressing the risk requires adopting prevention measures.	Addressing the risk requires adopting mitigation measures.	Managing the risk/impact requires adopting remediation or reparation measures.
Level of rights restoration upon implementing remediation measures	The measures adopted to restore the affected right or rights return to the situation prior to the impact.	The measures adopted to restore the affected right or rights partially return to the situation prior to the impact.	The measures adopted to restore the affected right or rights cannot return to the situation prior to the impact.

Table 2. Severity Range

VERY HIGH	18 - 21
HIGH	14 - 17
MEDIUM	10 - 13
LOW	0 - 9

Once the severity of the risk has been assessed, with a maximum value of 21 and a minimum of 0, the probability must be assessed.


- **PROBABILITY:** This criterion will consider the frequency with which the risk event has previously occurred.

Table 3. Probability scale

Frequent	Has occurred more than twice in the last year.
Probable	Has occurred in the last five years.
Rarely	Has occurred in the last ten years.
Improbable	Has never occurred.

Table 4. Human Rights Risk Assessment Scale

PROBABILITY	LOW	MEDIUM	HIGH	VERY HIGH
Frequent	2	2	3	4
Probable	1	2	3	4
Rarely	1	1	2	3
Improbable	1	1	2	3

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Cases rated 3 or 4 must always be brought to the attention of the Corporate Responsibility Management (GRT) – of the Corporate Institutional Relations and Communications Department (RRC) or the area responsible for HHRR matters in each EG company, for monitoring purposes, without replacing the follow-up work that must be done by each officer or team designated for its management.

Table 5. Management Responsible Party according to Risk Assessment

RISK RATING	RESPONSIBLE PARTY
4	Vice President or General Manager approves the risk analysis and actions to be adopted.
3	General Manager, Technical Manager, Production Manager, Maintenance Manager, Project Manager, directors, superintendents, department heads approve the risk analysis and actions to be adopted.
2	Coordinators, project leader, plant shutdown leader, supervisor approve risk analysis and actions to be adopted.
1	Controls are applied directly by the officer in charge, according to their responsibilities, and reported to the next level.

2.5.c. Treatment

In accordance with the Integrated Risk Management guidelines, this phase aims to establish and implement the appropriate actions, according to the identified risk. In this regard, the following is expected:


- Formulate, plan and execute risk treatment measures
- Assess periodically the effectiveness of treatment measures
- Decide whether the residual risk is acceptable
- Execute additional treatment if the residual risk is not acceptable

For HHRR risks, one or more prevention or mitigation actions may be taken. In this regard, in addition to ensuring that the Company’s actions follow a “do no harm” approach²⁰, it is expected that it will be possible to: (i) entirely avoid the risk by removing the potential source of impact; (ii) mitigate the risk by reducing the severity of the impact, should it occur; or (iii) mitigate the risk by reducing the probability of the impact occurring.

Prioritization: Given that multiple HHRR risks may be identified in the previous step, they must be prioritized to ensure their treatment. In this regard, prioritized HHRR risks should be identified based on the results of their severity and probability assessment. Accordingly, priority treatment should be given to those risks that are most severe and those where delay in treatment could result in irremediable effects or consequences. Accordingly, in scenarios in which HHRR risks are rated at levels 3 or 4, the project or activity managers must generate treatment measures for their prevention or mitigation, to the level at which the risk is tolerable.

Some of the measures that the company can take may include actions defined in environmental or social management plans; be established in corrective action plans; or correspond to HHRR training actions that facilitate addressing the identified risks.

²⁰ The ‘do no harm’ approach implies that any activity must avoid causing direct or indirect harm to people. Thus, it implies responsible conduct to ensure that the company’s actions do not violate rights. Although this concept was initially applied to humanitarian aid and peacebuilding contexts (Mary B. Anderson, Do No Harm Project), it was subsequently applied to the field of human rights and humanitarian response.

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It should also be considered that other actions may be adopted in collaboration with third parties, such as the State, local authorities, suppliers, partners and civil society organizations, amongst others.

Once the processing has been defined, residual risks must be determined, taking into account the effects of the treatment actions on the risk. If the residual risk level is not within acceptable levels, the treatment stage may be repeated before proceeding with risk acceptance.

To ensure the implementation of treatment actions, they must be integrated into business operations, understood by those involved, and followed up by the responsible team or officer and by the GRT, as appropriate. This follow-up will be carried out on an ongoing basis by the project or activity manager or their designee, through the technological tool designated for this purpose by the GRT.

In this regard, risk treatment plans must contain information related to:

- Positions or persons responsible for execution and follow-up
- Actions proposed within the treatment plan
- Performance or compliance measures
- Restrictions (if applicable)
- Reports and follow-up
- Action execution dates

2.5.d. Monitoring

This stage aims to carry out periodic follow-up on the management of the treatment measures established in the previous stage. Follow-up must be carried out by the responsible areas at least twice a year and, depending on the severity of the risk, determine whether more frequent follow-up is required.

At this stage, the results of the measures adopted must be recorded in the technological tool designated for this purpose by the GRT, in order to determine whether it is necessary to update the risk (its assessment), maintain the measures adopted or adopt new ones.

The effectiveness of controls or measures, as well as follow-up results, shall be reported to the appropriate supervisory level, and when rated and reported as 3 or 4, the follow-up shall be communicated to the GRT as defined in section 7.


2.5.d.1. Recording and reporting

The results of each phase of the risk management cycle must be documented and reported by the areas, through the mechanisms established for HHRR risks, principally the operational HHRR risk matrix available in the technological tool designated for this purpose by the GRT.

The record and report must contain:

- Description of the identified risk and its assessment.
- Activities from each stage of the risk management cycle and their results
- Information about the risk, which will serve as input for decision-making in each EG company.

This report must be framed in terms of HHRR due diligence, in accordance with the responsibilities that senior management has in this matter, as well as the Board of Directors and its Corporate Governance Committees and the Audit and Risk Committee as described in section 7.2. These reports must include the analysis of information relevant to the organization's objectives and contain the elements necessary for decision-making.

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Bearing in mind that the nature of the risks identified herein is operational, the following must be communicated to the Risk Management Department of the Corporate Compliance Department: residual risks outside the acceptance zone, risk materializations and others that are specifically requested.

In the case of each EG company, the identification and risk management information will be reported to the GRT. This information will feed the EG risk baseline, which must be taken into account as a basis for due diligence exercises in EG companies.

3. ANNEXES

HHRR risks are actual, potential or perceived impacts on the effective enjoyment of HHRR, as a consequence of activities carried out by Ecopetrol, within the framework of its systems, processes or projects.


HHRR risks are particular in that they refer to situations in which one or more HHRR of rights holders (every human being or the environment) may be affected as a direct or indirect consequence of business activities, and not to situations that may affect the company's performance. In this regard, human rights risks of a company are understood as the risks that its activities may lead to one or more adverse consequences on human rights.

The following can be found, among others, in the list of HHRR risks:

- Impact on the right to a healthy environment
- Impact on livelihoods due to operational incidents
- Impact on the right to life and/or personal integrity
- Impact on the right to prior consultation
- Impact on the right to equal employment opportunities
- Impact on the right to information and participation
- Impact on decent working conditions
- Deterioration of housing conditions, income sources and other livelihoods due to resettlement measures
- Exposure of children and adolescents to commercial sexual exploitation
- Impacts on land tenure, ownership and use
- Reduction in access to employment sources
- Impacts on the right to equality and non-discrimination
- Impact on the right to freedom of expression
- Impacts on the right to equality and physical integrity due to sexual harassment situations
- Impacts on the right to freedom of association and trade union freedom
- Exposure of children and adolescents to child labor
- Impact on the personal freedom of workers or contractor workers

4. VERSION HISTORY

Previous Document			
Version	Date dd/mm/yyyy	Document Code and Title	Changes
1	31/12/2021	GEE-G-042 Guide to the Human Rights Risk Management Cycle	Generation of the Human Rights Risk Management Cycle Guide.

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2	20/01/2022	GEE-G-042 Guide to the Human Rights Risk Management Cycle	Removal of an internal review comment in a document footnote.
New Document			
Version	Date dd/mm/yyyy	Changes	
3	30/12/2025	<ul style="list-style-type: none"> The area responsible for HHRR management is changed to the Corporate Institutional Relations and Communications Department, through the Corporate Responsibility Management. The scope of the Guide is limited to the controlled companies of the Ecopetrol Group. Information related to the Company's stakeholder groups is updated. Reference is made to the Responsible Business Conduct standard. The normative reference is expanded to include the Convention on Biological Diversity and the United Nations General Assembly Resolution 76/300 on the Human Right to a Clean, Healthy and Sustainable Environment. The categories to be considered in the differentiated approach are updated in accordance with the Human Wealth Policy. Reference is made to the HHRR risk baseline survey of the Ecopetrol Group, carried out by Ecopetrol S.A. It is established that treatment plans and information related to risk survey monitoring will be recorded in the technological tool determined by the Corporate Responsibility Management. The Audit and Risk Committee is removed from the bodies to which operational HHRR risks are reported. 	

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Document electronically signed, in accordance with Decree 2364 of 2012, which regulates Article 7 of Law 527 of 1999, on electronic signatures and other provisions.

To verify compliance with this mechanism, the system generates an electronic report that evidences the traceability of the review and approval actions by those responsible. If you need to verify this information, please request said report from Service Desk.