
	Guide on Human Rights and Business		
	Corporate Responsibility Management Corporate Institutional Relations and Communications Department		
	Code GEE-G-035	Prepared On 30/12/2025	Version: 3

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1. PURPOSE

To establish the guidelines that steer decision-making and management by the Ecopetrol Group¹ (hereinafter, the EG) in relation to Human Rights (hereinafter, HHRR), in accordance with the standards of Responsible Business Conduct² and the obligations established under the universal, Inter-American and domestic HHRR systems, insofar as they relate to its business activities.

2. GENERAL CONDITIONS

2.1 Scope

This Guide is addressed to the members of the Board of Directors of Ecopetrol and its controlled companies, as well as to the employees of the EG. Accordingly, this Guide shall be of mandatory knowledge and application for its addressees, who must ensure that their actions are always framed within the guidelines set forth herein.

Ecopetrol requires its suppliers and contractors to observe this commitment through contractual clauses applicable to the performance of their activities³.

Ecopetrol also urges its partners, allies, customers, agents and other actors with whom it maintains a contractual or commercial relationship to adopt the standards set out herein, especially in connection with activities carried out jointly.

2.2 Terms and Definitions

To make this Guide easier to understand, the following terms are defined:


Human Rights: These are the guarantees that safeguard human dignity and the freedoms held by every person or group of persons simply by virtue of existing. They are inherent to human beings, regardless of nationality, gender identity, ethnic affiliation, origin, religion, sexual orientation, personal history, or any other characteristic of their diversity. They are also inalienable, indivisible and interdependent⁴.

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

³ Ecopetrol S.A.'s suppliers and contractors must comply with the human rights protocol and the contractual annex on human rights, corporate responsibility, and diversity, equity, and inclusion.

⁴ To make this Guide easier to understand, the following terms are defined: <https://www.ohchr.org/es/what-are-human-rights>

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Human Rights Due Diligence: A continuous, dynamic and preventive process through which the EG identifies and assesses risks and adverse impacts on the HHRR of all its Stakeholders (SH)⁵ in order to cease, prevent, mitigate and, where applicable, remediate them, with a view to integrating effective measures, monitoring the implementation of action plans and their results, and reporting internally and externally on how such impacts are addressed in connection with its own activities, those of its supply chain and its other business relationships.

In line with the standards developed by the Organization for Economic Co-operation and Development (OECD), due diligence is oriented toward risks to people, the environment and society ("risk-based due diligence"), and not solely toward risks to the company or its reputation.

Respect for Human Rights: This entails refraining from actions or omissions that may adversely affect rights holders (people, groups of people and the environment), while at the same time promoting and protecting the fundamental freedoms of individuals or groups. It also requires addressing adverse impacts through effective remedy measures whenever the company causes or contributes to an impact.


2.3 Associated documents ⁶

In addition to this Human Rights and Business Guide, Ecopetrol has other internal policies that guide its operations and reaffirm its commitment to respecting human rights:

- Ecopetrol's Integrated Policy (SIG-POL-001)
- Code of Ethics and Conduct (SCU-B-001)
- Code of Ethics and Conduct for suppliers, contractors, subcontractors and allies
- Guide to the Human Rights Risk Management Cycle (GEE-G-042)
- Declaration of Commitment to Human Rights Defenders
- Guide on labor matters in activities contracted by Ecopetrol (GAB-G-013)
- Human Wealth Policy (GEE-POL-001)
- Integrated Land Management Strategy (GEE-N-001)
- Environmental Strategy
- Procedure for population resettlement in the development of operations and projects (GDE-P-023)
- Guide for engagement with ethnic communities (GDE-G-006)
- Procedure for conducting Prior Consultations (GDE-P-008)
- Due diligence instructions for addressing complaints and threats or impacts affecting personal integrity and life (SRC-I-001)

⁵ 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, ix) the scientific and academic community, x) civil society and cooperation organizations, and xi) subsidiaries.

⁶This refers to documents that are directly or indirectly related to human rights issues at Ecopetrol, though they do not necessarily have the same scope or objective.

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- Collective Bargaining Agreement – Human Rights chapter and Diversity, Equity and Inclusion (DEI) chapter with a gender perspective

3. DEVELOPMENT

3.1 Introduction

The corporate commitment to respecting HHRR, as well as proper management and due diligence around these matters, is grounded in Responsible Business Conduct and is essential to the achievement of the EG's strategic objectives and sustainability, since people and the environment are placed at the center of any decision or action undertaken within an EG operation or company.

Accordingly, HHRR become a cross-cutting commitment that contributes to the consolidation of a business culture aimed at ensuring that all actions undertaken by EG companies secure respect for and promotion of HHRR. This is done by adopting best practices to address the challenges of the industry and of the Just Energy Transition (JET), with opportunities, equity and justice for individuals and groups, while seeking to positively influence territorial transformation and the closing of social gaps.

The EG is committed to carrying out a JET framed by respect for and promotion of HHRR and Human Wealth as an enabler of diversity, equity, inclusion and belonging (HW) in the conduct of its activities. The EG acknowledges the expectations established in the 2023⁷ update of the OECD Guidelines for enterprises regarding the management of interrelated risks involving climate change, energy transition and human rights. Accordingly, it understands that decarbonization challenges require inclusive dialogue processes and an understanding of their implications for people's rights.


Respect for HHRR is a fundamental premise across all EG operations and is closely linked to the sustainability agenda, which materializes through the definition of its environmental, social and governance priorities and their interrelationship with HHRR. For this reason, the commitment to respect HHRR extends to all Ecopetrol Stakeholders.

3.2 Our commitment

The EG is committed to respecting HHRR and reaffirms its commitment to the Political Constitution of Colombia, Colombian law, the International Bill of Human Rights⁸, and the International Labour

⁷ The OECD Guidelines were updated in 2023, and the new version can be viewed at the following link: https://www.oecd.org/content/dam/oecd/es/publications/reports/2023/06/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_a0b49990/7abea681-es.pdf

⁸ The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights, along with its two Optional Protocols.

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Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as to the other international HHRR obligations assumed by Colombia.

It adheres to the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Ten Principles of the United Nations Global Compact, and the OECD Guidelines for Multinational Enterprises⁹. It is also committed to following the highest standards, including those set out in the Voluntary Principles on Security and Human Rights, ILO Convention 169, ILO Convention 190, and the Performance Standards of the International Finance Corporation (IFC), especially those related to labor and working conditions, resource efficiency and effectiveness and pollution prevention, fair and careful management in relation to landowners and landholders, biodiversity conservation and sustainable management of natural resources, and Indigenous Peoples.

Likewise, it states its commitment to the Convention on Biological Diversity and to United Nations General Assembly Resolution 76/300 on the human right to a clean, healthy and sustainable environment. This is undertaken within the framework of diligent climate action that contributes to mitigating the adverse impacts of greenhouse gases on ecosystems and people.

In order to contribute to the achievement of the Sustainable Development Goals (SDGs), the EG is committed to the Paris Agreement¹⁰ and understands the importance of incorporating respect for HHRR into the energy transition process to mitigate climate change. It also recognizes the importance of access to energy. Accordingly, and with a view to a JET, it develops dialogue and participation settings with Stakeholders to prevent potential impacts and to identify and implement opportunities and solutions to environmental and social challenges, while seeking to generate sustainable value in territories and among their various actors.


Likewise, it recognizes the importance of regional agreements aimed at respecting and promoting HHRR, such as the Escazú Agreement¹¹ and its emphasis on access to information and respect for human rights defenders, whose relevance to responsible business conduct it acknowledges. Given the particular importance of human rights defenders to society and to business due diligence, Ecopetrol has a Declaration of Commitment to Human Rights Defenders.

⁹ The GE adopts the expectation set forth in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023), according to which companies must prevent and address adverse impacts that they cause, contribute to, or are directly linked to through business relationships.

Furthermore, the GE incorporates the additional expectations of the OECD Guidelines for Multinational Enterprises (2023), including responsible conduct in the digital sphere, corporate integrity, the environment, climate change, and governance.

¹⁰ The provisions of Law 1844 of 2017, by which Colombia ratifies the Paris Agreement, shall be taken into account.

¹¹ The provisions of Law 2273 of 2022, by which Colombia ratifies the Escazú Agreement, shall be taken into account.

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The EG's commitment to respect HRRR extends to all internationally recognized rights. Nevertheless, within the scope of its operations and contractual and commercial relationships, companies will act proactively and in a differentiated manner to respect the following rights and freedoms¹²:

- Right to life.
- Right to personal integrity.
- Right to personal freedom.
- Children's rights, especially the prohibition of child labor.
- Right to equality and non-discrimination.
- Right to freedom of expression.
- Right to information.
- Right to privacy and personal data protection.
- Right to participation and the right to prior consultation.
- Right to a healthy environment.
- Right to work in dignified, favorable, adequate and non-discriminatory conditions.
- Right to a workplace free from violence and harassment.
- Prohibition of forced or compulsory labor and human trafficking.
- Freedom of association and collective bargaining¹³.
- Right to occupational health and safety.

The EG fosters inclusive work and social environments in which the value of all individuals is recognized without discrimination based on gender identity, sexual orientation, sex, physical ability, ethnic identity or affiliation, physiognomy, genetic characteristics, age, religious beliefs, political or philosophical ideology, educational level, nationality, family origin, language, victim status, socioeconomic level, or any other sociocultural characteristic, as well as thought, expression and ways of being.

Additionally, the EG promotes a culture that fosters information security and the protection of personal data of its employees and other SH, in line with digital human rights standards¹⁴.


In this regard, in pursuit of its commitment to HW¹⁵, and especially with diversity, equity, inclusion and belonging, the rejection of discrimination and the principle of equity for the equal enjoyment of rights, Ecopetrol adheres to the United Nations Women's Empowerment Principles, the Standards of Conduct for Business for the protection of LGBTI persons of the Global Compact, and commits to the Guide for Business on the Rights

¹² These rights and freedoms will be specifically analyzed in the risk assessments conducted by companies regarding their own operations and those carried out with partners, as well as within their supply chain.

¹³ Commitments regarding labour and human rights are implemented in line with the formal social dialogue bodies recognized within Ecopetrol, such as the Collective Labour Agreement, the Joint Human Rights Commission and the Workplace Relations Committee. It should be noted that for workers affiliated to the Unión Sindical Obrera (USO), the Human Rights chapter and the Diversity, Equity and Inclusion (DEI) chapter with a gender focus of the Collective Labour Agreement apply.

¹⁴ Digital rights are an extension of human rights in the digital sphere.

¹⁵ Ecopetrol's Human Capital Policy. Available at: <https://files.ecopetrol.com.co/web/esp/diversidad/gee-pol-001politica-riqueza-humana.pdf>

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of Persons with Disabilities and the ILO Guide on Ethnic Diversity at Work. Likewise, it rejects any action associated with modern slavery¹⁶ and human trafficking in its operations and business relationships.


Ecopetrol reaffirms its commitment to the consolidation and promotion of decent work throughout its value chain, to prevent risks that affect the effective enjoyment of workers' rights, with an emphasis on the prevention and management of workplace and sexual harassment, strengthening work environments free from violence and discrimination.

Principles for Ecopetrol's HHRR Management:

Nine (9) principles guide HHRR management:

- 1. Due Diligence in HHRR:** The EG is committed to ensuring that, within the framework of its operations, a continuous, dynamic and preventive HHRR due diligence process is carried out, through which risks and adverse impacts on the HHRR of all its SH are identified and assessed in order to cease, prevent, mitigate and remediate them, with a view to managing and integrating effective measures, monitoring the implementation of action plans and their results, and reporting internally and externally on how such impacts are addressed in relation to its own activities, those of its supply chain and other business relationships.
- 2. Remediation:** In cases where Ecopetrol identifies that it has caused or contributed to causing adverse HHRR impacts, it will provide for the restitution of the rights holder to the situation prior to the harm, and where this is not possible, it will redress the impact through compensation, satisfaction, rehabilitation or any other measure that ensures effective HHRR remediation, through the operational grievance mechanisms established by the Company or within any other legitimate process.
- 3. Mainstreaming:** Respect for HHRR is a commitment of the EG that guides its relationship with its various SH and is reflected in the management of all areas and each of the companies, within the framework of their roles and competencies, in accordance with the highest national and international standards.
- 4. Complementarity:** Ecopetrol recognizes that the roles and competencies of the State in HHRR matters differ from those of companies. It acknowledges the obligation of States to respect, guarantee and protect HHRR, as well as the responsibility of companies to respect them and provide remediation in the event of adverse impacts.
- 5. Collaborative Work:** Ecopetrol seeks to coordinate its HHRR management with the efforts of other organizations, whether public entities in the implementation of their policies, private entities with experience in the management of HHRR matters, international organizations, or other actors who may be relevant to business management with an HHRR approach.

¹⁶ It is a term that encompasses situations associated with slavery, servitude, forced labour and child labour. It is prohibited under national and international legal frameworks and constitutes a serious violation of human rights, as it infringes upon people's freedom and dignity.

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6. **Differentiated Approach:** Ecopetrol respects the rights of persons belonging to groups or populations that may be particularly vulnerable to adverse HHRR impacts. 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, among others, the gender, ethnic, origin and sociocultural characteristics, disability, reconciliation, sexual orientation and age approaches, as well as 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.
7. **Territorial Approach:** In the conduct of business activities, the particularities of each territory where the company operates are taken into account in order to prevent HHRR risks and impacts and conflict situations, depending on the operational context.
8. **Continuous Improvement:** Monitoring and self-assessment are fundamental elements for improving HHRR management. This management is underpinned by a set of elements (objectives, plans and indicators) defined jointly with the various areas responsible for HHRR matters.
9. **Application of the Highest Standard:** In the event of a conflict between local laws and international HHRR standards, Ecopetrol will endeavor to observe whichever provision has a higher standard of respect for HHRR, always seeking to align its practices with the highest guidelines on the matter.

3.3 Due Diligence


Ecopetrol identifies and manages risks and adverse impacts arising from business activities, the supply chain or other contractual or commercial relationships, and establishes action plans for their prevention, mitigation or remediation. This takes place at the strategic, tactical and operational levels, in accordance with the Integrated Risk Management System¹⁷ and based on the operational HHRR risk cycle.

In this exercise, HHRR-related risks and impacts are identified on an ongoing basis, adapting the process to changes in the operational context, determining whether they occur as a direct consequence of the Company's actions, whether there has been a contribution to the potential adverse effects, or whether they are a consequence of its business relationships.

It also takes into account the human rights risks and impacts arising from regional dynamics, paying particular attention to the implications for the rights of workers and communities. During this cycle, Ecopetrol prioritises the inclusion of the views and expectations of its stakeholders, particularly those in vulnerable situations and those considered to be in need of special protection constitutional¹⁸ in order to understand the effects of the Company's actions on the territory and its people.

¹⁷ The Human Rights Risk Management Cycle Guide (GEE-G-042) provides guidelines for the identification and management of human rights risks at Ecopetrol, in accordance with the provisions of the Guide to Integrated Risk Management within the Ecopetrol Group and international human rights standards. The departments and/or processes defined therein are responsible for identifying human rights risks at the operational level.

¹⁸ Those who are subject to special constitutional protection are individuals who, due to their physical, psychological or social circumstances, require positive action to achieve real and effective equality. In this regard, special measures are required to address specific circumstances within the process of managing risks and impacts on human rights. This category includes children, adolescents, older people, people with disabilities, female heads of household, people displaced by violence, indigenous peoples and those living in extreme poverty.

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Given that some of the areas where the EG operates are affected by dynamics of violence, public order issues and social conflict, due diligence processes must be progressively intensified or strengthened to prevent conflict from escalating or the EG from becoming involved with or favoring any of the conflict actors. Likewise, the EG will strengthen its due diligence procedures regarding environmental matters.

Annual HHRR Plan

Ecopetrol has a PDCA cycle¹⁹ (See Annex A) to manage HHRR-related matters. From this derives the annual HHRR plan, which is the tool that ensures the adequate application of this Guide²⁰ for Ecopetrol, led by the Corporate Institutional Relations and Communications Department (RRC), through the Corporate Responsibility Management (GRT)²¹.

Its preparation takes into account the results of SH perception and expectation analyses, national and international environmental, social and governance trends, self-assessment results, reports on operational HHRR risks, national and international standards on the matter, results from external assessments, and reports on petitions, complaints and claims related to HHRR. Regulatory changes, public policies and best practices, among other sources, are also considered.

The annual HHRR plan incorporates the actions defined with the areas responsible for managing these matters, which are in charge of implementation and quarterly progress reporting. The plans also include cross-cutting training, communication and monitoring actions. Its approval and follow-up are the responsibility of the RRC, through the GRT.

The companies to which this Guide applies must annually approve their HHRR plan to ensure adequate management of this matter. They must also report both its formulation and compliance to the Corporate Responsibility Management of Ecopetrol S.A. The foregoing is in accordance with the EG's Relationship Model.

3.4 Implementation, Governance and Communication

The implementation of this Guide is part of the Corporate Responsibility System (CRS) that guides Ecopetrol's conduct as an exemplary corporate citizen, with the aim of contributing to the achievement of business objectives.


Likewise, through the Relationship Model²² of the EG, Ecopetrol, through the RRC, provides guidelines for the implementation of the HHRR matters described in this Guide and in other documents directly related to the subject. The implementation and operability of these guidelines will be the responsibility of the areas in charge of the relevant topics in each company.

¹⁹ A cycle comprising the following steps: Plan, Do, Check and Act.

²⁰ Each EG company will draw up its annual or biannual action plan in line with its human rights management cycle.

²¹ Within other companies, the definition of the plan, as well as other due diligence measures, will be led by the department with functions equivalent to those of the Corporate Responsibility Department at Ecopetrol.

²² Regarding with Guide GEE-G-041, the purpose of the Group Entity (GE) Relationship Model is to effectively coordinate the companies within the Ecopetrol Group, seeking to ensure their alignment and promoting valuable interactions. The Relationship Model is implemented through functions, which carry out management, control and service activities, defining the extent to which Ecopetrol, as the Group's parent company, interacts with the companies within the Group.

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HHRR matters are addressed at the highest level of Ecopetrol. For this reason, the topic is part of the ongoing training of its Board of Directors, in order to stay at the forefront and informed of relevant HHRR issues that contribute to the Company's and its Group's strategic decision-making.

Thus, the Board of Directors of Ecopetrol, as the Company's strategic guide and director, is regularly apprised of relevant HHRR matters, to ensure that Ecopetrol's and the Group's strategy and management consider them comprehensively. This topic is also addressed in greater detail by the Corporate Governance and Sustainability Committee of the Ecopetrol Board of Directors. This Committee is informed about identified HHRR risks and impacts in order to prevent their occurrence.

In accordance with their objectives and functions under Circular 01 (Circular GOC-J-001) and the respective bylaws, the Strategic Committee and the Management Committee of Ecopetrol address strategic matters and relevant cross-cutting matters, respectively. These strategic, relevant and cross-cutting matters include those related to HHRR and their follow-up, which may be presented to the aforementioned Committees as determined. HHRR matters may also be monitored and brought for informational purposes to other bodies, such as the Business Line Committees.

The RRC, through the GRT, is responsible for the governance and steering function on HHRR-related matters at Ecopetrol, and both corporate and business areas have responsibilities in their operation and management (see governance diagram in ANNEX B).

Furthermore, Ecopetrol raises awareness and provides HHRR training to the members of the Ecopetrol Management Committee, as well as to its entire workforce, and regularly communicates this policy to the workers of the EG and to other SH, in the spaces established for this purpose.

Likewise, it promotes these matters among its suppliers, partners, customers and other SH, with the aim of ensuring HHRR-respectful management throughout all its operations, its supply chain and other business relationships.


Ecopetrol maintains permanent communication channels and ongoing dialogue with communities to proactively address and respond to potential HHRR impacts.

3.5 Indicators for HHRR Management

Through its Performance Model, Ecopetrol establishes its Balanced Scorecard (BSC)²³ for Ecopetrol and the Group companies, compliance with which is mandatory. Indicators are established therein to measure performance in matters that incorporate material environmental, social and governance (ESG) issues. Additionally, at the process level, indicators are also incorporated to measure the performance of areas in managing HHRR-related matters, monitored periodically by the responsible area.

The follow-up on the above indicators is reinforced by compliance with the Annual HHRR Plan, against which the indicator for the fulfillment of the actions defined in the Company is also reported. Follow-up is conducted quarterly by the RRC, through the GRT, considering the information provided by the

²³ Progress on the TBG is reviewed by each vice-presidency within the framework of its Management Committees, with the aim of identifying their contribution to its achievements or shortcomings. Furthermore, the status of the Group's TBG is reported monthly to the Corporate Vice-Presidency for Finance and Sustainable Value, to the Strategic Committee, and subsequently to Ecopetrol's Board of Directors.

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responsible areas in accordance with the processes established at Ecopetrol. Monitoring compliance with HHRR plans in the other Group companies must be carried out by the responsible areas in each of them, according to each company's internally defined process.

The indicators formulated for monitoring HHRR-related matters are not static and may vary as deemed appropriate.

3.6 Grievance Mechanisms²⁴

Ecopetrol has internal and external channels accessible to all SH (see Annex C), as do the other Group companies to which this Guide applies. Through these channels, all types of petitions, complaints and claims are addressed, including those related to HHRR matters. Rights holders who feel affected by Ecopetrol's business activities, including those arising from its business relationships, may use these channels to express their complaint or petition.

Ecopetrol ensures accessible and effective service channels, guaranteeing strict confidentiality of petitions, complaints and claims, and the complete absence of retaliation against those who submit them in good faith. This commitment applies to all persons who access these channels, fostering an environment of trust.


The National USO-Ecopetrol Human Rights Commission and its Regional Sub-Commissions, through the mechanisms established in the Collective Bargaining Agreement, shall be considered a grievance mechanism.

The EG recognizes the judicial and non-judicial mechanisms established by authorities to resolve disputes and build consensus. Those who use the mechanisms established by the Company are not required to waive their right to file a petition, complaint or claim through judicial or administrative channels. Ecopetrol urges its suppliers, partners and other allies to design and implement service channels that meet the effectiveness criteria established by the UNGPs.

With regard to disputes arising in the course of its operations, without prejudice to the rights of rights holders or any other intellectual property rights holder, to access the administration of justice, Ecopetrol promotes the use of Alternative Dispute Resolution Mechanisms (ADR), which, in the case of Ecopetrol, as a company with the legal status of a mixed-economy company under the terms of Law 1118 of 2006, must always be preceded by compliance with the requirements pertaining to state liability, the procedures and approvals set out in the applicable regulations, and are subject to the oversight of the Attorney General's Office and the contentious-administrative courts.

Likewise, it will cooperate with the National Contact Point for Responsible Business Conduct established by the National Government, under the Ministry of Commerce, Industry and Tourism.

²⁴ At Ecopetrol, 'grievance mechanisms' refer to the procedures for handling requests, complaints and claims. The term 'complaints mechanism' encompasses any standard procedure, whether governmental or non-governmental, judicial or extrajudicial, that enables complaints to be lodged and remedies to be sought for human rights violations related to business activities. For further information: <https://www.pactomundial.org/wp-content/uploads/2015/04/Principios-Rectores-sobre-Empresas-y-Derechos-Humanos.-Naciones-Unidas-2011.pdf>

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3.7 Operational Remediation Mechanisms²⁵

In cases where Ecopetrol identifies that it has caused or contributed to causing adverse HHRR impacts on rights holders, it will provide or reasonably cooperate in the compensation or remediation of impacts, as applicable, through the operational response mechanisms established or within any other legitimate process.

The EG will promote dialogue to manage case-based learning and a preventive approach.

3.8 Benchmarking

Ecopetrol recognizes the value of collaborative work in ensuring HHRR-respectful management in the business sphere. In this regard, in pursuit of the principle of collaborative work, the Company participates in various initiatives on the matter: IPIECA, United Nations Global Compact, Guías Colombia and the ANDI's Human Rights and Responsible Business Conduct Committee, among others.

3.9 Contribution

Ecopetrol discloses its HHRR management following the best business practices in reporting. To this end, it takes into consideration high standards on the matter, as well as the guidance provided by the RRC, through the GRT.

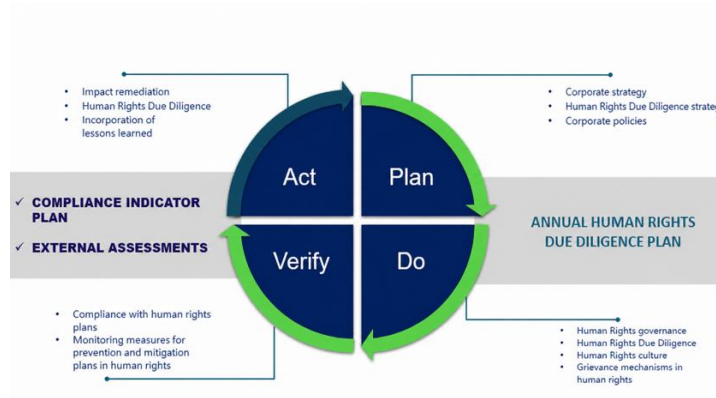
Ecopetrol promotes transparency through the public disclosure of specific HHRR information (e.g. actions, indicators, due diligence processes, results and lessons learned) in its Integrated Management Report and on its website²⁶, in compliance with applicable international regulations.

²⁵ In accordance with Guiding Principle 22, "If businesses determine that they have caused or contributed to adverse impacts, they should remedy them or contribute to their remediation through legitimate means". According to the same principles, "Even with the best policies and practices, a business may cause or contribute to adverse human rights impacts that it could not have foreseen or avoided. If a company identifies such a situation, whether through its human rights due diligence process or by other means, it must make every effort, in accordance with its responsibility to respect human rights, to remedy the situation, either on its own or in cooperation with other stakeholders. The establishment of operational-level grievance mechanisms for those potentially affected by business activities can be an effective means of redress." For further information: <https://www.pactomundial.org/wp-content/uploads/2015/04/Principios-Rectores-sobre-Empresas-y-Derechos-Humanos.-Naciones-Unidas-2011.pdf>

²⁶ The human rights microwebsite on the Ecopetrol website can be reached at the following link: <https://www.ecopetrol.com.co/wps/portal/Home/sustainability/materiality-strategy/cross-cutting-issues/human-rights>


4. ANNEXES

A. Cycle PDVA




B. Governance



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C. Grievance mechanisms

Stakeholders	Channels for submitting complaints and claims; stakeholder groups
Employees, early retirees, pensioners and their beneficiaries (EMP)	<ul style="list-style-type: none"> - - Human Rights Commission under the current Collective Labour Agreement. - - Business partner (BP) for each business unit - - Citizen Participation Offices (OPC) quejasysoluciones@ecopetrol.com.co - - Workplace Harmony Committee - - Health helplines: (601)4926811 – (601)3909649 - National Freephone / medical advice line: 018000915556. 24/7 - - Bogotá helpline: (601)2344333 - - Ethics helpline <ul style="list-style-type: none"> • http://lineaetica.ecopetrol.com.co • International helpline (toll-free international dialling code) 018009121013 • National Helpline in Bogotá (601)2343900 or Extension 43900 for Ecopetrol employees. • Ethics and Compliance Office, in the main Ecopetrol building, in Bogotá. • Ethics mentors nationwide.
Suppliers, Contractors and their employees (PRO)	<ul style="list-style-type: none"> - - Telephone line: (601) 234 5000, option 3 for Ecopetrol suppliers and contractors - - Bogotá line: (601) 234 4333 - - Email: relacionamiento.proveedores@ecopetrol.com.co - - Supplier meetings
Society and community	<ul style="list-style-type: none"> - - Community relations officers responsible for maintaining ongoing engagement with local communities and authorities across all areas of operation. - - Online form for submitting requests, complaints and claims. - - Email: participacion.ciudadana@ecopetrol.com.co quejasysoluciones@ecopetrol.com.co - - Corporate Call Center. National freephone number: 01 8000 918418 - - Customer service teams. Personalised service in municipalities where the company does not have a permanent


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	<p>presence.</p> <ul style="list-style-type: none"> - Customer service offices located in various municipalities across the country.
Customers and partners	<ul style="list-style-type: none"> - Tel: (601) 234 5000, option 1 - Environmental Committees and/or committees acting in their stead.


Previous Document			
Version	Date	Document Code and Title	Changes
1	29/05/2013	GRG-D-001, Guide on Human Rights	<ul style="list-style-type: none"> • The document is amended in accordance with the document management guidelines. • The document type is changed to 'Guideline'. • The terms defined in the glossary are expanded. • A detailed description is provided of each of the phases involved in implementing the guideline. • A section on roles and responsibilities is included. <p>The outline of the Human Rights Management model is included.</p>
1	28/06/2019	SRC-G-002, Guide on Human Rights and Business	<ul style="list-style-type: none"> • The document is aligned with the Corporate Accountability System Guide, which forms part of Ecopetrol's Management System. • The code and version are updated in accordance with the new system • The international standards on which ECP's human rights management will be based are reviewed. • Principles for human rights management are incorporated. • The scope of the document is defined as the Ecopetrol Group.

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1	30/09/2021	GEE-G-035, Guide on Human Rights and Business	<ul style="list-style-type: none"> • The document is amended in accordance with document management guidelines. • The scope and application of the Human Rights Guide are described. • The Cultural Declaration is incorporated into the Human Rights and Business Guide. • The sustainability strategy (TESG) is incorporated into the Human Rights and Business Guide. • Ecopetrol’s commitment to respecting human rights is extended to its stakeholders and business partners. • International standards to which Ecopetrol adheres in order to carry out its human rights management are reviewed and added. • The principle of Differential Approach is incorporated. • A section on Governance has been added to the description of the Guide’s implementation, and the company’s human rights strategy, direction and guidelines have been developed. • Ecopetrol’s governance framework is included. • A section on Due Diligence has been added to the description of the Guide’s implementation. • The human rights management cycle framework is included. • A detailed description is provided of the annual human rights plan and the indicators for human rights management. • A detailed description is provided of the complaint and remediation mechanisms within the implementation of the Human Rights and Business Guide. • A detailed description is provided of training and communication within the implementation of the Human Rights and Business Guide. • A detailed description is provided of the references within the implementation of the Human Rights and Business Guide. <p>The description relating to Ecopetrol’s report within the implementation has been amended.</p>
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2	28/12/2023	GGE-G-035 Guide on Human Rights and Business	<ul style="list-style-type: none"> • The international standards on which ECP's human rights management will be based are reviewed. • Commitments are incorporated in accordance with the standards of the International Finance Corporation (IFC) • A commitment to the United Nations Declaration on the Rights of Indigenous Peoples is incorporated. • The Escazú Agreement is mentioned as one of the regional human rights agreements that Grupo Ecopetrol must take into account for its due diligence. • A commitment to the Convention on Biological Diversity and United Nations General Assembly Resolution 76/300 on the human right to a healthy environment is incorporated. • A commitment to decent work is incorporated, emphasising the rejection of modern slavery and human trafficking. • Ecopetrol Group's commitment to the Paris Agreement is mentioned. <p>Reference is made to Ecopetrol's Human Rights Risk Management Cycle Guide to describe human rights due diligence exercises.</p> <ul style="list-style-type: none"> • The concept of a just energy transition is incorporated as a fundamental element of human rights management at Ecopetrol and as part of the public commitment to human rights. • Clarifications are provided on the application of the guide in accordance with the Company's engagement model. • The 2040 strategy and its relationship with human rights are included. • The principle of reparation is included, taking into account the provisions of the UN Guiding Principles. • The Comprehensive Territorial Strategy is incorporated into the relevant guidelines. • The importance of understanding the expectations and perceptions of groups entitled to special constitutional protection is emphasised. <p>The complaints mechanism is amended to extend its scope to commercial relations.</p>
New Document			
Version	Date dd/mm/a aaa	Changes	

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3	30/12/2025	<ul style="list-style-type: none"> • The department responsible for human rights management has been transferred to the Corporate Directorate of Institutional Relations and Communications, via the Corporate Responsibility Department. • A definition of respect for human rights has been included in the glossary. • A new principle of action on human rights has been added. • Guidelines relating to the Human Capital policy have been incorporated. • The categories to be taken into account in the differential approach are updated. • A guideline is included for Ecopetrol Group companies to which this Guide applies, requiring them to have an annual human rights plan and to report both its formulation and compliance to the Corporate Responsibility Department of Ecopetrol S.A.
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For further information, please contact:	
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Electronically reviewed by:	Electronically approved by:
<p>MÓNICA ANDREA TANGARIFE PEDRAZA Corporate Responsibility Manager National ID No. 52.869.845 Corporate Directorate of Institutional Relations and Communications</p>	<p>DIANA MARCELA JIMÉNEZ RODRÍGUEZ Corporate Director of Institutional Relations and Communications National ID No. 52.254.034 Corporate Directorate of Institutional Relations and Communications</p>
<p style="font-size: small;"><i>Document signed electronically in accordance with Decree 2364 of 2012, which implements Article 7 of Law 527 of 1999 on electronic signatures and sets out further provisions. To verify compliance with this mechanism, the system generates an electronic report that provides evidence of the traceability of the review and approval actions carried out by the responsible parties. If you need to verify this information, please request this report from the Service Desk.</i></p>	