

REPORTING ON BREACHES TO THE CODE OF CONDUCT 2025

Conduct Category /Area	Total Reported Incidents ¹	Reports Closed Resulting in No Violation	Reports closed without grounds for initiating an investigation	Reports Currently Being Investigated	Reports Closed Resulting in a Violation ²
Corruption or Bribery ³	34	7	4	21	0 ⁴
Discrimination or Sexual harassment	14	3	1	9	1 ⁵
Customer Privacy Data	1	0	0	1	0
Conflict of Interests	71	8	0	57	7
Money Laundering or Insider Trading Dealing	0 ⁶	0	0	0	0
Loss of Confidential Information	34	7	2	23	2 ⁷
Theft	9	1	1	6	1
Antitrust / Anticompetitive Practices	5	0	3	2	0 ⁸
Environment, Health, and Safety	8	2	2	4	0
Disrespect, Mistreatment or Hostile Environment	90	22	22	37	9
Breach of Rules and Procedures ⁹	391	78	120	157	37
Other Case Typologies ¹⁰	55	8	27	20	0
TOTAL	712	136	182	337	57

¹ The numbers shown in this column reflect the initial category assigned according to the information initially provided in the report. Reports received in 2025 and those under investigation on January 1, 2025, are included. The reports received refer to those involving Ecopetrol employees.

² Some reports were reclassified into other categories during the investigation based on the information gathered: (i) 1 of the 7 “Conflict of interest” breaches was initially classified as “Corruption or bribery”; (ii) 1 of the 37 breaches of “Non-compliance with rules and procedures” was initially classified as “Corruption or bribery.”

³ Corruption defined as the will to act dishonestly by abusing the power or trust entrusted by Ecopetrol to obtain personal benefits, either directly or indirectly and/or favoring third parties against the company's interests. Corruption includes bribery practices.

⁴ During 2025 there were no breaches regarding bribery and corruption.

⁵ This breach corresponds to sexual harassment, not discrimination.

⁶ During 2025, Ecopetrol did not received reports related to: i) money laundering, ii) insider trading / dealing

⁷ These breaches were related to the loss of corporate confidential information.

⁸ The risk of antitrust or anticompetitive practices did not materialize.

⁹ This category includes any failure to comply with Ecopetrol’s internal regulation and procedures.

¹⁰ “Others Case Typologies” grouped other matters different from the ones required on the chart.

ACTIONS TAKEN WITH RESPECT TO THE CONFIRMED BREACHES¹

Conduct Category / Area	Confirmed Breaches	Corrective Actions				Preventive Actions				
		Notification to the Vice presidency of Organizational Talent	Notification to the Attorney General's Office	Notification to the Disciplinary Control Management	Notification to the Vice presidency of Legal Affairs	Reports to the UIAF ²	Notification to the Assurance of Risks and Internal Control Management	Preventive Ethical Conversations	Notification to the Vice presidency of Administration and Services	Notification to other company areas or subsidiary companies for preventive actions
Corruption or Bribery	-	-	-	-	-	-	-	-	-	-
Discrimination or Sexual harassment	1	1	-	1	-	-	-	1	-	-
Customer Privacy Data	-	-	-	-	-	-	-	-	-	-
Conflict of Interests	7	-	-	5	1	1	-	3	1	1
Money Laundering or Insider trading Dealing	-	-	-	-	-	-	-	-	-	-
Loss of Confidential information	2	-	-	1	-	-	-	1	-	-
Theft	1	-	-	1	-	-	-	-	-	-
Antitrust / Anticompetitive Practices	-	-	-	-	-	-	-	-	-	-
Environment, Health and Safety	-	-	-	-	-	-	-	-	-	-
Disrespect, Mistreatment or Hostile Environment	9	1	-	1	-	-	-	7	-	-
Breach of Rules and Procedures	37	1	2	12	2	4	2	13	4	2
Other Case Typologies	-	-	1	-	-	-	-	-	-	-
TOTAL	57	3	3	21	3	5	2	25	5	3

¹ Please note that a single case may involve one or more actions, depending on the number of people investigated and the category of the conduct.

² The Financial Information and Analysis Unit (UIAF) is an economic and financial intelligence agency of the Colombian Government, that centralizes, systematizes, and analyzes the information provided by reporting entities and open sources, to prevent and detect possible money laundering operations, its source crimes, and the financing of terrorism.