

	Guide on Human Rights and Business		
	Corporate Responsibility System Secretary General		
	CODIGO GEE-G-035I	Elaborado 06/04/2022	Versión: 1

1. PURPOSE AND SCOPE

To establish the elements that guide Ecopetrol's¹ Human Rights (hereinafter HHRR) integration in its business practice, based on the Universal Declaration of Human Rights, the Inter-American Human Rights System, and national HHRR systems and standards, directly related to business activities.

2. DEVELOPMENT

CULTURAL STATEMENT

Ecopetrol is a company "From All, for All" and understands its culture as an aspect that guides the behavior of its employees. "To be the Energy that Transforms Colombia" is the Higher Purpose that gives meaning to all operations and inspires Ecopetrol to act with coherence and commitment.

Ecopetrol guides its actions based on six (6) Cultural Principles:

- (i) Life first: we take care of ourselves, and we take care of the planet
- (ii) Always Ethical: we are transparent and coherent with our principles
- (iii) Passionate for excellence: we are committed to obtaining exceptional and sustainable results
- (iv) We respectfully listen and talk with clarity: we lead from diversity and inclusion
- (v) We make possible the impossible: we create innovative solutions with anticipation and technology
- (vi) We are one team: we build our strength from collaboration

TESG STRATEGY

TESG (technology, environment, social, and governance) is defined as the contribution to and creation of long-term value that aims at responsible, safe, and efficient operations, harmonizing the relationship with both the environment and our stakeholders. This under a framework of transparent and ethical governance, using technology for the development of innovative solutions to current and future challenges.

Ecopetrol's HHRR integration and advancement is the basis for managing the material issues defined in its TESG strategy. The commitment to respect HHRR is expected to extend to all Ecopetrol's stakeholders.

OUR COMMITMENT

Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. Additionally, Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly.

¹ This Guide applies to companies that are consolidated in Ecopetrol S.A. and its subsidiaries (Ecopetrol S.A., Cenit, Hocol, Esenttia, Ecopetrol América, Ecopetrol Brazil, Ecopetrol México, Ecopetrol Costa Fuera and Refinería de Cartagena). The terms "Ecopetrol", "we", "us", "our" or the "Company" are thus used to refer to companies that are consolidated into Ecopetrol S.A. and its subsidiaries. The other companies of the Ecopetrol Group may follow or implement these guidelines as defined by their corporate bodies.

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Ecopetrol reaffirms its commitment to respect HHRR as set forth in the International Bill of Human Rights² and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Ecopetrol adheres to the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, and the OECD Guidelines for Multinational Enterprises. The Company is also committed to following the provisions of the Voluntary Principles on Security and Human Rights, the ILO's 169 Convention, and the International Finance Corporation's (IFC) Performance Standard 7: Indigenous Peoples.

Additionally, in accordance with its commitment to diversity, inclusion, rejection of discrimination, and the equal enjoyment of all rights, Ecopetrol promotes inclusive social and work environments. These environments recognize the value of all people regardless of sex, physical capacity, ethnicity, physiognomy, genetic characteristics, age, religious beliefs, political or philosophical ideology, educational level, nationality, family origin, language, sexual orientation, gender identity, socioeconomic level, or any other socio-cultural characteristic, or difference in thought, expression, or personality.

Thus, Ecopetrol implements the international standards of the United Nations Women's Empowerment Principles, the UN Standards of Conduct for Business on Tackling Discrimination Against LGBTI people, the Guide for companies on the Rights of People with Disabilities, and the ILO Guide on Ethnic Diversity in the Workplace.

Ecopetrol's commitment to respect HHRR encompasses all internationally recognized rights. However, within the framework of its business activities and its contractual and commercial relations, Ecopetrol acts proactively and in a differentiated manner to respect and promote the following rights and freedoms:

- Right to life
- Right to personal integrity
- Right to personal freedom
- Freedom of association and collective bargaining
- Right to decent, favorable, and adequate conditions, preventing forced and child labor
- Right to occupational health and safety
- Children's rights
- Right to equality and non-discrimination
- Right to freedom of expression and thought
- Right to information
- Right to privacy and personal data protection
- Right to the participation of ethnic groups through prior consultation
- Collective and environmental rights

PRINCIPLES FOR ADVANCING HHRR

Six principles guide Ecopetrol's HHRR integration in business practice:

² The International Bill of Human Rights is composed 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 and its two Optional Protocols.

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1. **Due diligence in HHRR:** Ecopetrol understands that due diligence implies a set of interrelated processes to identify negative impacts, prevent and mitigate them, follow up on the implementation of HHRR plans and their results, and report on how negative impacts of the business activity are addressed in its operations, its supply chain, and other business relationships. The Company identifies potential or actual risks and impacts associated with HHRR, arising from business activities or environmental conditions, in order to prevent and mitigate them and, to remedy them if they materialize.
2. **Cross-cutting nature:** Respect for HHRR is a commitment of Ecopetrol, which materializes in its relationship with its different stakeholders and is reflected in the management of all areas of each of its companies, within the framework of their functions, in accordance with the highest national and international standards.
3. **Complementarity:** Ecopetrol acknowledges that the roles and responsibilities of the State regarding HHRR are different from those of companies. Ecopetrol recognizes the obligation of States to respect, ensure and protect HHRR, as well as the responsibilities of companies to respect them and provide remediation when necessary.
4. **Collaborative work:** Ecopetrol seeks to coordinate HHRR in its business activity and practice with the efforts of other organizations. These include public agencies in the implementation of their policies, private agencies with experience advancing HHRR, international organizations, and other stakeholders that may be relevant at advancing HHRR in business activity.
5. **Differential approach:** Ecopetrol respects the rights of people who belong to groups or populations that may be particularly vulnerable to adverse impacts on their HHRR. In the development of its business activity, Ecopetrol applies a differential approach to prevent, mitigate, or remedy such impacts. Components of the differential approach include a focus on gender and ethnicity, among others. The following are also understood as subjects of a differential approach: the population who experience some form of disability, children, and the migrant population.
6. **Monitoring and self-assessment:** These are fundamental elements for the continuous improvement of HR management. This management is based on a series of elements (objectives, plans, and indicators) defined jointly with the different areas in charge of HR issues.

IMPLEMENTATION

The implementation of these guidelines is part of the Corporate Responsibility System (SRC, from its name in Spanish) that guides Ecopetrol's behavior as a corporate citizen, considering the changing expectations of stakeholders, best practices, and international standards of corporate responsibility, in order to leverage the achievement of the Company's business goals.

I. GOVERNANCE

Strategy and direction

The Board of Directors of Ecopetrol S.A., as the Company's strategic guiding body, is regularly informed of relevant HHRR issues. This is how the Company ensures that HHRR are considered comprehensively

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in all business activity and strategy. They are also addressed in greater detail in the Corporate Governance and Sustainability Committee of the Board of Directors. The Board of Directors of Ecopetrol S.A. receives quarterly reports on human rights performance.

The relevance of presenting strategic HHRR issues and how the Company advances HHRR in business practice, in the Executive Committee and the Steering Committee, is defined based on the provisions of Notice 01 (Notice GOC-J-001), on these, is and according to their duties. Likewise, HHRR issues may be followed up and brought to other instances for information purposes, such as the Segment Committees.

The Secretary General, through Corporate Responsibility (GRT), is responsible for the governance and direction to advance HHRR in Ecopetrol. Both corporate and operational areas of the Company are responsible for advancing human rights in all business activity (for instance, identification and management of operational HHRR risks). The implementation and monitoring of the guidelines are the responsibility of the management of each company of Ecopetrol Group according to the definitions of their governing bodies.

Likewise, Corporate Responsibility provides guidelines for the implementation of HHRR elements described in this Guide, and other documents directly related to the subject through Ecopetrol's Relationship Model. The implementation and operation of these guidelines is the responsibility of the areas leading HHRR in each company.



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Human Rights Guidelines and Directives

In addition to this human rights Guide, Ecopetrol has other internal instruments that guide its efforts and reaffirm its commitment to respect HHRR³.

- Ecopetrol's Integral Policy
- Code of Ethics
- Declaration of Commitment to Human Rights Defenders
- Labor aspects guideline of third-party contracted activities
- Diversity and Inclusion Guideline
- Resettlement guideline
- Guideline for interacting with ethnic groups
- Guideline on Prior Consultation

II. DUE DILIGENCE

Ecopetrol S.A. has defined a HHRR evaluation cycle for advancing human rights in its business activity. This cycle considers different sources of information feeding the Company's human rights due diligence.

As part of this human rights cycle, Ecopetrol identifies and manages risks and negative impacts arising from its business activity, the supply chain, and other contractual and commercial relationships, and establishes action plans for their prevention, mitigation, or remediation. This occurs at the strategic, process, and operational levels, in accordance with the Integrated Risk Management System⁴. This exercise identifies the risks and impacts that the company may cause, to which the company may contribute or with which the company may be related. Ecopetrol also incorporates those risks and impacts on HHRR derived from the context, especially on the community, workers, and workers of contractors.

In developing this cycle, Ecopetrol ensures to consider the perceptions and expectations of its stakeholders, especially those who may be more vulnerable.

The companies of the Group to which this Guideline applies, as defined in the Scope, shall ensure to advance human rights with strong due diligence.

Given that some of the areas where Ecopetrol operates are affected by conflict, a situation that increases the risk that the Company, its suppliers, partners, and other stakeholders with whom it maintains relationships may be involved in HHRR abuses, Ecopetrol will intensify its due diligence⁵ and promote strong due diligence in its value chain.

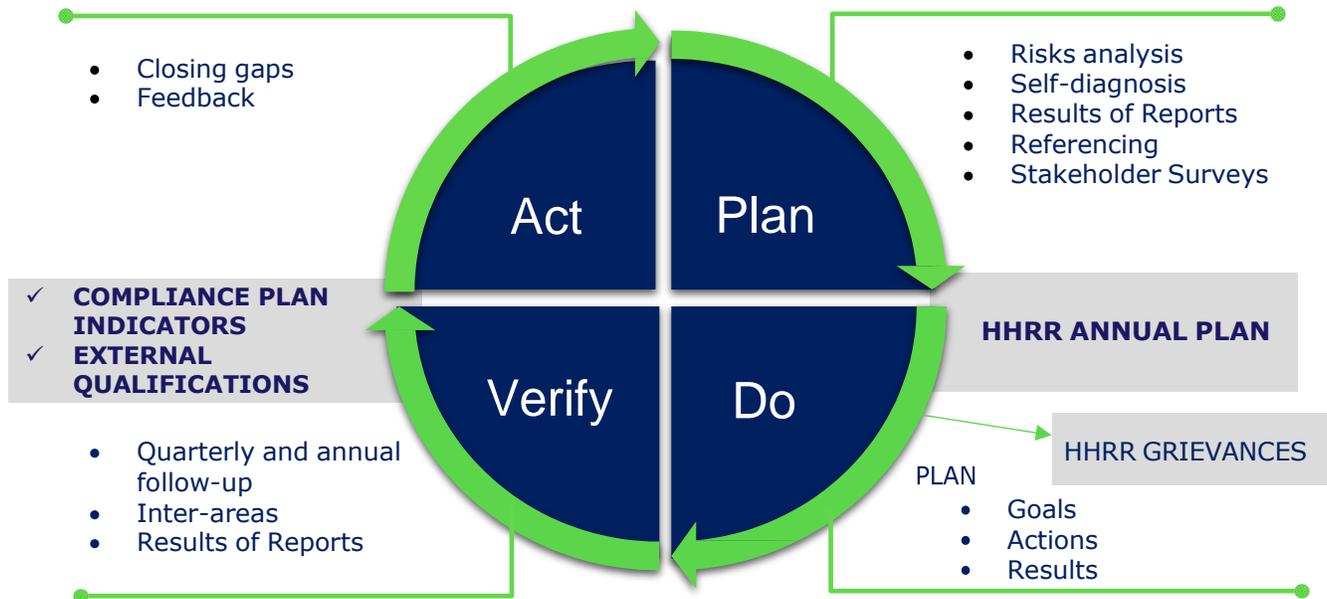
For these cases, Ecopetrol will rely on the competent institutions in each of the jurisdictions where they operate, so they reinforce their human rights due diligence process with relevant information to determine, prevent, and address the main human rights and International Humanitarian Law (IHL) risks, based on all applicable legislation.

³ This list is merely enunciative.

⁴ Corporate Responsibility will define the HHRR risk management cycle, through that provides guidelines for advancing human rights and managing HHRR risks in Ecopetrol. This is in accordance with the provisions of the Guideline for Integrated Risk Management of Ecopetrol Group and international human rights standards. The areas of the company and/or processes defined therein shall be responsible for the identification of human rights risks at the operational level.

⁵ Especially regarding detecting, preventing, and mitigating human rights risks, arising from its business activities and those associated with its business relationships.

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Annual Human Rights Plan

The annual HRRR plan is the tool that ensures the adequate application of the human rights Guideline. The preparation, monitoring, and assessment of this plan for Ecopetrol S.A. are led by Corporate Responsibility, in collaboration with other areas of the organization. It is also part of the Corporate Responsibility System management tools. In the other Group companies, the definition of the plan will be led by the area equivalent area to Corporate Responsibility.

The preparation of this plan considers the results of the analysis of the perceptions and expectations of the stakeholders, risks analysis, self-diagnoses, reports related to operational HRRR risks, performance assessments of contractors, external standards and measurements, including assessment results (DJSI⁶, CHRB⁷, inter alia), consolidated reports on pleas, complaints and claims, legal actions, and complaints related to HRRR issues. Regulatory changes, public policies, and the development of good practices, inter alia, are also considered.

The HRRR Annual Plan must incorporate the actions defined with the areas responsible for these issues. They are responsible for the implementation and reporting progress on a quarterly basis. The plans will also include cross-cutting training, communication, and monitoring actions. Approval and follow-up will be the responsibility of Corporate Responsibility.

As defined in the Scope of this Guideline, each company of the Group will define its action plan, in accordance with its human rights evaluation cycle for advancing human rights in its business activity.

⁶ Dow Jones Sustainability Index

⁷ Corporate Human Rights Benchmark

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Indicators for advancing business and human rights

Ecopetrol establishes on an annual basis, the relevant indicators to account for how it is advancing human rights in its business activity. These are defined in the Company's balanced Scorecard and are subject to periodic monitoring in the corresponding committees for each vice-presidency. The information on the behavior of each vice-presidency is recorded in the business performance tool and feeds Ecopetrol's human rights evaluation cycle.

The following are common indicators for measuring business human rights performance:

Right to life, integrity, and decent working conditions

- Total Recordable Injuries Frequency – TRIF

Climate change and water

- GHG Emissions Reduction
- Water Reuse

Sustainable local development

- Economic reactivation

Monitoring goal compliance allows the adoption of timely prevention and mitigation measures for relevant human rights issues. This is notwithstanding the identification or formulation of new human rights indicators.

The monitoring of relevant issues is reinforced with the compliance of the human rights Annual Plan, which reports compliance with the defined actions. The monitoring of this particular indicator is done quarterly by Corporate Responsibility, once all responsible areas have reported to Corporate Responsibility, according to the processes established in Ecopetrol.

The plan compliance monitoring in Group companies must be carried out by the responsible areas, according to the process defined internally by each company.

III. GRIEVANCE MECHANISMS

Ecopetrol S.A. has internal and external communication channels accessible to all stakeholders. Likewise do other Group companies to which this Guide applies. All types of grievances are addressed through these channels, including those related to human rights. Rights holders who feel affected by Ecopetrol's business activity can use these channels to express their grievances.

Ecopetrol acknowledges that access to these communication channels is neither a condition nor an impediment for those who consider themselves affected, to resort to mechanisms provided by the State for handling grievances and claims. Therefore, those who use such communication channels are not required to waive their right to file a claim through judicial or administrative processes, as a precondition for filing their claims.

The following table shows the communication channels available in Ecopetrol S.A.

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Stakeholders	Communication channels for filing complaints and claims
Employees, early retirees, retirees, and their beneficiaries (EMP)	<ul style="list-style-type: none"> - Human Rights Committee of the Collective Bargaining Agreement in Force. - <i>Business partner</i> (BP) for each of the business units - Citizen Participation Offices (OPC, from its name in Spanish) participacion.ciudadana@ecopetrol.com.co quejasysoluciones@ecopetrol.com.co - Labor Coexistence Committee - Health care hotline: National Toll-Free hotline / medical advice hotline: 018000915556. 24/7 - Bogotá hotline: 2344333 - Ethics hotline <ul style="list-style-type: none"> ▪ http://lineaetica.ecopetrol.com.co ▪ International hotline (Free International Prefix) 018009121013 ▪ National hotline in Bogotá 2343900 or Extension 43900 for Ecopetrol's Employees. ▪ Ethics and Compliance Office at Ecopetrol's main building in Bogota. ▪ Ethical advisors nationwide.
Suppliers, contractors, and their employees (PRO)	<ul style="list-style-type: none"> - Hotline 2345000 option 3 for suppliers, contractors of Ecopetrol - Bogotá hotline: 2344333 - Email: relacionamiento.proveedores@ecopetrol.com.co - Supplier's Meetings
Society and community (SC)	<ul style="list-style-type: none"> - Community development professionals leading the relationship with communities and local authorities in all areas of the operation. - Online form to submit grievances, complaints, claims, etc. - Email. participacion.ciudadana@ecopetrol.com.co quejasysoluciones@ecopetrol.com.co - Corporate <i>Call Center</i>. Toll-free National hotline: 01 8000918418 - Service brigades. Personalized attention in municipalities without the permanent presence of the Company. - <i>Teleiguanas</i>. Telephone booths that communicate directly with the corporate call center. - Personalized service offices located in different municipalities of the country.
Customers and shareholders	<ul style="list-style-type: none"> - Hotline 2345000 Option 1 - Community Committees and Committees acting in their capacity as such.

Operational-level remedy mechanisms

In cases where Ecopetrol identifies that it has caused or contributed to adverse impacts on the human rights of others, the Company and its companies will provide, or reasonably cooperate in the compensation or remediation of impacts, through the operational grievance mechanisms provided or in the framework of any other legitimate process.

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Regarding the controversies originated within the framework of its operation, notwithstanding the right of the community or any other stakeholder to have access to the administration of justice, Ecopetrol promotes the use of Alternative Dispute Resolution Mechanisms (ADRM, or MASC from its name in Spanish) which, in the case of Ecopetrol S.A., since it is a state-owned company, must always be preceded by compliance with the requirements of state responsibility and subject to the control of the Attorney General's Office and the contentious-administrative jurisdiction.

Ecopetrol acknowledges that the National Contact Point, provided for in the Guidelines of the Organization for Economic Cooperation and Development (OECD), regulated through Decree 1400/2012 and currently headed by the Colombian Ministry of Commerce, Industry and Tourism, is a mediation mechanism for situations in which there is controversy regarding the application of the aforementioned Guidelines.

IV. TRAINING AND COMMUNICATION

Human rights are overseen at the highest level in Ecopetrol. For this reason, the subject is part of the continuous training of the Board of Directors to keep the Board at the forefront of the most relevant issues for the Company.

Ecopetrol also raises awareness and provides training in human rights to the members of Ecopetrol S.A. Steering Committee and the members of the governing bodies that represent them in other companies, as well as to all workers.

Likewise, Ecopetrol promotes these issues among their suppliers and other stakeholders. This ensures advancing human rights respect throughout their operations, their supply chains, and other business relationships.

To this end, Ecopetrol facilitates access to information through face-to-face and virtual spaces and, when deemed necessary, relies on external experts or State agencies with expertise in the field.

This policy must be disseminated periodically to Ecopetrol employees and other stakeholders, in the spaces established for this purpose.

V. REFERENCING

Ecopetrol acknowledges the value of collaborative work to ensure advancing human rights in all its business activities. Thus, the Company, developing the principle of collaborative work, is part of various initiatives including IPIECA, the United Nations Global Compact, "Guías Colombia", and the Committee on Human Rights and Responsible Business Conduct of ANDI (Colombian National Industries Association), inter alia.

Ecopetrol is also part of the Hydrocarbons and Human Rights Group led by the National Hydrocarbons Agency and supports the implementation of the National Action Plan on Business and Human Rights in Colombia.

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VI. REPORT

Ecopetrol discloses how it advances human rights in all its business activities based on the best practices for reporting. To this end, Ecopetrol considers the highest standards, as well as the guidance provided by the Secretary General and Corporate Responsibility for such purposes.

LIST OF VERSIONS

Previous Document			
Version	Date	Document Code and Title	Changes
1	29/05/2013	GRG-D-001, <i>Directriz de Derechos Humanos</i> (Human Rights Guideline)	<ul style="list-style-type: none"> The document is adjusted in accordance with the document management guidelines. Changed the document type to Guideline. The terms defined in the glossary are extended. A detailed description of each of the phases for the implementation of the guideline is provided. A number of roles and responsibilities are included. The outline of the HR Management model is included.
1	28/06/2019	SRC-G-002, <i>Guía de Derechos Humanos y Empresa</i> (Guide on Human Rights and Business)	<ul style="list-style-type: none"> The document is harmonized with the Corporate Responsibility System Guide, part of Ecopetrol's Management System. Code and version are updated according to the new system The international standards on which Ecopetrol advances human rights are reviewed. Principles for advancing human rights in business activity are incorporated. The scope of the document is defined for Ecopetrol Group.
New Document			
Version	Date	Changes	
1	11/01/2022	<ul style="list-style-type: none"> The document is adjusted in accordance with document management guidelines. The scope and application of the HHRR Guide are described. The Cultural Declaration is incorporated into the Development of the Guideline of HHRR and Business. The TSEG strategy is incorporated into the Development of the HHRR and Business Guideline. Ecopetrol's commitment to respect HHRR is extended to their stakeholders and business partners. International standards to which Ecopetrol must adhere to advance human rights in its business activities are reviewed and added. The principle of Differential Approach is incorporated. A section on Governance was added to the description of the implementation of the Guideline, and the Company's strategy, direction, and guidelines on HHRR were developed. 	

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		<ul style="list-style-type: none"> • Ecopetrol's governance guideline is included. • A section on Due Diligence was added to the description of the implementation of the Guideline. • The outline of the human rights evaluation cycle is included. • A detailed description of the annual HHRR plan and indicators is provided. • A detailed description of the grievance and remediation mechanisms for the implementation of the Business and HHRR Guidelines is provided. • A detailed description of the training and communication for the implementation of the Business and HHRR Guideline is provided. • A detailed description for referencing the implementation of the Business and HHRR Guideline is provided. • The description regarding Ecopetrol's reporting is adjusted within the implementation.
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