
	ANTI-CORRUPTION MANUAL		
	Integrated Internal Control System Corporate Compliance Vice Presidency		
	CODE SCI-M-001	Prepared 27/12/2021	Version: 1

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1. OBJECTIVE

To establish the general guidelines and directives for Ecopetrol S.A. (Ecopetrol), for the implementation of mechanisms for the prevention, monitoring, detection and reporting of acts of corruption that may occur in the company.

This document applies to the employees of Ecopetrol S.A., as well as to its managers, partners (including Joint Ventures), strategic allies, shareholders, contractors, subcontractors and, in general, to all its counterparties, in the development of any business, contractual or legal relationship of any kind, as applicable.

This document incorporates local and international norms and standards applicable to Ecopetrol, as well as policies, standards and procedures that allow timely management of corruption risks.

This Manual is a reference for the companies of the Business Group and may be complied with by their Boards of Directors as appropriate, in accordance with local legislation. In this sense, each company must implement anti-corruption policies according to its organizational structure, respecting the general guidelines issued by Ecopetrol and following the guidelines established in this document.


2. GENERAL CONDITIONS

2.1. Scope of Application

The guidelines contained in this Manual must be applied to the development of Ecopetrol's activities, processes and business, and are intended to manage corruption risks and promote a "Zero Tolerance" attitude towards corruption in its different forms in Ecopetrol and the Business Group.

2.2. General Guidelines

- Ecopetrol has a clear policy of zero tolerance towards fraud, bribery, corruption, violations to the Foreign Corrupt Practices Act ("FCPA"), money laundering and financing of terrorism, financing the proliferation of weapons of mass destruction and rejection of any behavior that may constitute a violation of the Political Constitution of Colombia and/or applicable local or foreign laws. Likewise, it rejects any conduct that violates or disregards the provisions contained in the Code of Ethics and Conduct and internal regulations. Based on this, the addressees of this Manual shall:
 1. Refrain from participating in acts that constitute compliance violations (fraud, bribery, corruption, violations of the FCPA Act, money laundering, financing of terrorism, financing the proliferation of weapons of mass destruction, and the like).
 2. Promote, maintain, execute and strengthen the Compliance Program, the Internal Control System and an ethical and transparent culture in the organization to prevent and mitigate the materialization of compliance risks.
 3. To have tools that identify the company's risks and contemplate control measures to mitigate them.
 4. Investigate and sanction all actions involving the materialization of any of the compliance risks.
 5. Reject acts of favoritism, clientelism or nepotism in the selection processes.

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6. To have adequate and confidential channels to receive and manage complaints, dilemmas and queries, which may even be submitted anonymously. In no case will reprisals against those who use these channels be admitted.
 7. Cooperate with national and foreign authorities in carrying out any inquiry and/or investigation involving the Ecopetrol group, its employees, managers, counterparties, beneficiaries, and others required.
- Ecopetrol does not tolerate the achievement of results in exchange for violating international, national or internal regulations or, in general, by means of any dishonest action. The company's senior management fully supports those who refuse to engage in acts of corruption, even if as a result a business opportunity is lost.
 - In compliance with the legal provisions in force¹, Ecopetrol has an Anti-Corruption and Citizen Service Plan, by virtue of which, an annual scheme for the identification and control of corruption risks is contemplated, as well as mechanisms to strengthen the attention and service to citizens.
 - In the event of warning signs², Ecopetrol must carry out all the actions in its charge to establish whether acts of corruption have been committed, and if it considers it appropriate, it must refer them to the corresponding authorities.
 - If those who must implement these guidelines have doubts in relation to the provisions of the Foreign Corrupt Practices Act (FCPA), the provisions of the U.S. Department of Justice (DOJ), other national or foreign anti-corruption laws, or the provisions contained in this Manual, it is appropriate to ask the Corporate Management of Ethics and Compliance Affairs for clarification of the case, through the ethics line, channel for dilemmas and queries.
 - The compliance reports corroborated by any company of the Business Group, which present compliance typologies (corruption, fraud, FCPA, LAFT/FT/FPADM), without exception, must be reported to the Ecopetrol Compliance Officer.


3. DEVELOPMENT

3.1 Definition and forms of corruption

Corruption consists of the will to act dishonestly by abusing the power or trust entrusted by Ecopetrol in order to obtain personal benefits, either directly or indirectly and/or favoring third parties against the company's interests. Some typical forms of corruption are:

¹ Law 1474 of 2011. Article 73. "Anti-corruption and citizen service plan. Each entity of the national, departmental and municipal order shall annually develop an anti-corruption and citizen attention strategy. Said strategy shall contemplate, among other things, the map of corruption risks in the respective entity, the concrete measures to mitigate those risks, the anti-bureaucracy strategies and the mechanisms to improve the attention to the citizen. The Presidential Program for Modernization, Efficiency, Transparency and Fight against Corruption shall indicate a methodology to design and follow up the aforementioned strategy. Paragraph. In those entities where an integral risk management system has been implemented, the methodology of this system may be validated with the one defined by the Presidential Program for Modernization, Efficiency, Transparency and Fight against Corruption".

² Warning Signals: Facts, situations, events, amounts, quantitative and qualitative indicators, financial ratios and other information that the Company determines as relevant and from which it can be inferred in a timely and/or prospective manner the possible existence of a Risk or of a fact or situation that escapes what the Company determines as normal.

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3.1.1. Bribery

Bribery is an offer, proposal, promise, delivery, acceptance or solicitation of an undue advantage of any value, whether in money or in kind (products, services, offers, promise to pay something in the future), directly or indirectly, in exchange for an undue personal benefit, for a third party or for the company, or for a person to act or refrain from acting. Bribery can include public officials, natural persons, companies and/or private organizations³.

The Foreign Corrupt Practices Act FCPA, which applies to Ecopetrol because it is listed on the New York Stock Exchange (NYSE), establishes that it is a crime to pay or offer anything of value, directly or indirectly to a non-US public official, to obtain or retain business or to obtain an improper business advantage, under penalty of the corresponding sanctions by the US Department of Justice - DOJ and the Securities and Exchange Commission - SEC. For its part, in Colombia, Law 1778 of 2016 (or those that modify or add to it) defines what is related to conducts that constitute transnational bribery, as well as what corresponds to its investigation and sanction by administrative bodies, control and judicial authorities.

It is illegal and violates the provisions of the FCPA, and therefore of Ecopetrol, to offer undue payments through third parties. Likewise, payments through intermediaries (agents or partners in Joint Venture and others), knowing that these, or part of these, will be used directly or indirectly for bribery, are prohibited.

No relationships shall be entered into with natural or legal persons for whom there is no full identification or sufficient evidence of: their activities, operations, business or beneficiaries, based on the results of documents or due diligence activities⁴.

Bribery may be **transnational**⁵ when a foreign public official is promised or offered, for his or her benefit or that of a third party, directly or indirectly, sums of money, any object of pecuniary value or other benefit or advantage in exchange for performing, omitting or delaying any act related to the exercise of his or her functions and in connection with an international business or transaction.

Bribery, in the terms of the first paragraph of this section, is considered to be that requested or accepted by Ecopetrol employees or any person or entity acting on its behalf, such as: suppliers, contractors, subcontractors, partners.


They may be considered as bribes, among others:

- Money, securities or securities
- Payment or reimbursement of travel expenses
- Gifts

³ In Colombia, Article 405 of the Penal Code defines bribery as a crime committed by a public servant by receiving money or other utility to omit or delay an act proper to his service, benefiting both the passive and the active subject. Article 406 of the Criminal Code defines improper bribery when a public servant accepts for himself or for another, money or benefit either directly or indirectly, for an act to be performed in the performance of his duties.

⁴ APPENDIX 4. Counterparty Management Procedure - Manual for the System of Self-Control and Integral Risk Management of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction.

⁵ Law 1778 of 2016, Article 30. Transnational bribery. Article 433 of the Criminal Code shall read as follows: Whoever gives, promises or offers to a foreign public servant, for the benefit of this or a third party, directly or indirectly, sums of money, any object of pecuniary value or other benefit or utility in exchange for this to perform, omit or delay any act related to the exercise of his functions and in relation to an international business or transaction, shall incur imprisonment from nine (9) to fifteen (15) years, disqualification from the exercise of public rights and functions for the same term and a fine of six hundred and fifty (650) to fifty thousand (50.000) legal monthly minimum wages in force.

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- Training
- Attentions or benefits to family members
- Services: Payment of public or private utilities, in-kind services (painting, electricity, consulting)
- Complimentary favors
- Scholarships
- Internships
- Sponsorships
- Undue payments disguised as contributions
- Offers of employment
- Discounts
- Partial payments, cancellation or forgiveness of debts
- Commissions
- Entertainment (tickets to events and shows, etc.)
- Improvements to real or personal property
- Telephones/Cell phone plans

Ecopetrol has the Guide for the Management of Gifts and Entertainment (ECP-UEC-G-001 or the one that modifies it), which must be consulted before accepting or giving any gift or invitation and which establishes specific rules on this matter.


3.1.2. Facilitation Payments

These are small, unofficial and improper payments made to obtain or expedite the performance of a necessary routine action to which the person making the payment is entitled. These types of payments are prohibited in Ecopetrol, even if they are minor. In order for Ecopetrol employees to be able to identify them in case they are confronted, the following are their characteristics:

- Whoever pays does not intend to obtain a business or contract; only to promptly resolve a matter, speed up a procedure, or a similar situation.
- The one who pays has the right to obtain what he/she is requesting.
- The payee is usually a public official or employee of an organization, with some control over the procedure. Payments to commercial service providers may also occur.
- The official or employee is not entitled to payment.
- They are usually made in secret.
- It may happen that a company operates simultaneously in a country where facilitation payments are strictly prohibited and, in another country, where they are permitted under certain circumstances.
- It is not necessary that the payment or benefit is perfected, a simple promise is sufficient to constitute the offense.

3.1.3. Political contributions

They include any contribution or support, in cash or in kind, made for the purpose of supporting a political cause. In-kind contributions may include the gift of goods or services, advertising or promotional activities that support a political party, the purchase of tickets to fundraising events, the rental of meeting facilities such as tents, chairs, etc., and contributions to research organizations linked to a political party.

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Political contributions⁶ are prohibited in Ecopetrol and, therefore, employees may not, directly or indirectly, even personally, finance or make contributions to political parties, movements or campaigns, or induce others to do⁷ so, in accordance with the applicable rules, and the detour of social investment funds, charitable contributions or sponsorships to political activities or activities unrelated to the purposes established by Ecopetrol is also prohibited.

It is important to clarify that contributions to social investment, charitable contributions and sponsorships that do not have political purposes are permitted activities for Ecopetrol and can be exercised as long as they are aligned with Corporate Policies. To avoid that these legal activities end up having political purposes, a rigorous due diligence process must be carried out in order to know the recipients of their activities, operations, businesses or beneficiaries⁸.

3.1.4. Lobbying

Lobbying activities and payments for lobbying services are prohibited in Ecopetrol, either directly or indirectly through any of its business partners, agents, etc. Lobbying means paying to influence policy or legislative decisions, or to influence decisions to be made by government officials. Ecopetrol employees may only relate with public servants for the development and execution of the Company's own activities, in all cases in compliance with internal and external provisions governing the matter. In this relationship, such lobbying activities and any act of corruption, bribery, provision or receipt of benefits, or any fact that may affect or call into question transparency are prohibited. Examples of lobbying are:

- i. Payments to third parties to manage the issuance of laws, ordinances or agreements that favor Ecopetrol.
- ii. Payments to third parties to manage the issuance of licenses or permits.
- iii. Payments to third parties to negotiate with government officials the design of public policies that favor Ecopetrol.

3.2. How to act in case of knowledge of possible corruption events

In the event that any recipient of the Code of Ethics and Conduct and this Manual becomes aware of or is the subject of an act of bribery or attempted bribery, or knows of contributions to political campaigns (with Ecopetrol resources or even of its employees in their personal capacity) or of facilitation or lobbying payments made with Ecopetrol resources, must immediately report such situation to the Corporate Management of Ethics and Compliance Affairs, through the channels for queries and complaints⁹, without prejudice to going to the competent authorities.


⁶ Code of Ethics and Conduct of the Ecopetrol Business Group. Facilitation payments, political contributions and donations, charitable contributions that do not comply with the requirements of article 355 of the Political Constitution, lobbying activities and payments for lobbying services, and the detour of money from social investment activities or sponsorships to political activities or activities unrelated to the purposes established by the Company are prohibited. Remember that the violation of these prohibitions could result in the imposition of sanctions in accordance with the law and our internal rules.

⁷ Article 48 of Law 734 of 2002, Single Disciplinary Code, establishes the following as very serious misconduct: "(...) 40. Using employment to pressure individuals or subordinates to support a political cause or campaign or to influence electoral processes of a partisan political nature."

⁸ APPENDIX 4. Counterparty Management Procedure - Manual for the System of Self-Control and Integral Risk Management of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction.

⁹ Currently, Ecopetrol has the following tools or mechanisms for internal and external complaints:

- Link: <http://lineaetica.ecopetrol.com.co>
- Web Page/ Ethics Line
- International Line (No Cost International Prefix) 018009121013
- National Line in Bogota 6012343900 or Extension 43900 for Ecopetrol employees.

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No recipient should feel pressured to agree to this type of conduct under any circumstances and is reminded that such conduct is illegal under Colombian law.

Ecopetrol prohibits retaliation against any person who reports in good faith an alleged or actual violation of the Colombian Anti-Corruption Statute (Law 1474 of 2011), Law 1778 of 2016, the FCPA, those that modify or add to them, and/or any other national or international anti-corruption or anti-bribery regulation.

It is important to highlight that in accordance with the disciplinary rules, public servants, as is the case of Ecopetrol employees, have the duty to report to the competent authorities the crimes, contraventions and disciplinary offenses of which they have knowledge¹⁰. Likewise, Article 417 of the Penal Code establishes as a crime the abuse of authority by omission of denunciation of public servants when, knowing of a crime, they do not inform the corresponding authorities. Article 67 of the same law states that it is the duty of all persons to report crimes of which they are aware.

3.3. Preventing acts of corruption in contracting

Contracting is a process that is generally vulnerable to acts of corruption. In order to prevent workers from acts of this nature in the different contractual stages, the following situations are listed as examples and not exhaustive:

Design:

- Contract direction based on technical, legal and economic specifications, among others.
- Manipulation of the information or conditions of the purchase/contracting need so that a contract is assigned to one or several third parties in particular.
- Purchases or contracting of services for values that do not adjust to the real values of the market.
- Leaking or manipulating technical information and in general of the process to be opened (budget, decisions in Committees) sensitive for the benefit of oneself or a third party.


Selection:

- Direction of the type of contractor selection processes (direct selection, closed competition, open competition).
- Directing the conditions of the process to favor the selection of a certain contractor.
- Influencing the bid evaluation process or adjusting the results to favor one of the participants.
- Selection of suppliers by direct contracting without justification, and the contractor not being the best option.
- Fractionation of contracts avoiding the required instances of decision and approval.
- Awarding contracts in exchange for favors or personal benefits.
- Leaking or manipulating sensitive technical or economic information for one's own benefit or that of a third party.
- Requesting or receiving participation, profit or bribe from the contractor in exchange for being favored.

- To the employees of the referred Management and/or directly with the Corporate Vice President of Compliance or in the Ethics and Compliance Office.

All complaints received through these channels are analyzed in accordance with the Ethics Management Procedure. Whistleblowers are assured that their identity will be kept confidential. However, the whistleblower may, if he/she so wishes, use the channels anonymously.

¹⁰ Law 734 of 2002 article 34 numeral 24 subrogated by article 38 numeral 25 of Law 1952 of 2019 or those that modify or replace them.

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Execution:

- Lack of control in changes that arise in specific activities or amounts during the execution of the contract/project.
- Requesting or receiving participation, profit or bribery by the contractor to expedite receipts and payments, requesting contractual additions that imply monetary increases, increasing delivery times avoiding the imposition of fines for non-compliance, avoiding the imposition of fines in general, among others.
- Leaking or manipulating sensitive technical information for their own or a third party's benefit.
- Manipulate progress reports of contracts/projects/works to expedite payment.
- Influence the conclusions of the auditors by hiding or manipulating relevant information of a contract/project/project.
- Receiving goods or services not contemplated in the scope of the contract or outside the specifications and nevertheless paying for them in order to receive a percentage or remuneration.
- Receiving or soliciting gifts or gratuities from contractors or suppliers.
- Payment for goods/services that have not been received or do not comply with the technical specifications, or that lack adequate support.

Liquidation:

- Influencing the findings of financial controllers by concealing or manipulating relevant information of a contract/work/project.
- Receiving or requesting gifts or perks from contractors or suppliers in exchange for making a settlement that is not appropriate.
- Payment for goods/services that have not been received or do not meet technical specifications.

3.4. Other situations that could give rise to corruption events

3.4.1. Conflict of Interest


3.4.2.

Corresponds to the actions of a person in matters in which he/she has a particular and direct interest in its regulation, management, control or decision, or his/her spouse, permanent partner or any of his/her relatives in consanguinity: first degree (parents, children), second degree (siblings, grandparents, grandchildren), third degree (uncles, nephews, nieces), fourth degree (cousins); first affinity (parents-in-law, stepchildren, stepparents) and second (brothers and sisters-in-law), Civil (children or adoptive parents)¹¹, or his/her partners in law or de facto¹².

Ecopetrol's Code of Ethics and Conduct prohibits acting in conflict of interest and establishes the duty to report it and withdraw from the respective actions. The Instructions for the Management and Prevention of Conflicts of Interest and Ethical Conflicts (SCI-I-005 or the one that modifies it) indicate the types of conflicts that may arise, the applicable regulations and the situations in which they may occur, as well as the steps to follow for their declaration, reporting and management within the areas, the duty to disclose them and the possible consequences of not reporting them or acting in a conflict situation. This duty and commitment is also contemplated and replicated at the highest level, in Ecopetrol's Bylaws, in the Board of Directors Regulations, and in the Good Governance Regulations. Its infringement is understood as a violation of the internal labor regulations.

¹¹ Article 40 of Law 734 of 2002: Spouse, permanent partner, or any of their relatives up to the fourth degree of consanguinity, second degree of affinity or first civil degree.

¹² Article 498 of the Code of Commerce: The commercial company will be de facto when it is not constituted by public deed. Its existence may be proven by any of the evidentiary means recognized by law.

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It must be taken into account that Ecopetrol employees are public servants and, therefore, the corresponding rules of the Unified Disciplinary Code apply to them in this matter, so that incurring in conflict may constitute a disciplinary offense¹³.

Ecopetrol extends the guidelines on conflicts of interest to its bidders, contractors, suppliers, customers, partners or allies through the Code of Ethics and Conduct applicable to them and through the subscription of ethical clauses in order to guarantee:

- i. The knowledge, commitment and application of the ethical and anti-corruption standards that govern Ecopetrol in the development of its business.
- ii. The commitment to act in a transparent manner and to report the facts that transgress ethical principles through the business ethics line.
- iii. Not to incur in a conflict of interest or ethical conflict.
- iv. That no facilitation payments, gifts, promises or the offering of other advantages, directly or indirectly, through any person or entity, to public officials.
- v. Termination for non-compliance, in Ecopetrol and its Business Group.

Likewise, contractors and allies sign the Contractual Integrity Commitment form through which they ratify the duty to act in accordance with Ecopetrol's ethical principles and guidelines and not to incur in situations of conflict of interest that may affect the development of business.

The Code of Ethics and Conduct also enshrines the concept of ethical conflict. Its configuration violates the principle of integrity, and it is defined as any action or circumstance that may imply a conflict of interest or that undermines objectivity, equity, independence or impartiality, since private interest may prevail over decision-making for one's own benefit or that of a third party and/or to the detriment of the company's interests. When in doubt about a potential conflict, a dilemma should be formulated before the business ethics line.

3.4.3. Treatment of transactions involving Government Officials or Entities

Prior to carrying out a transaction involving a public servant, whether acting on behalf of a public entity or linked to the counterparty in a personal capacity¹⁴, a due diligence process must be carried out on the recipient of the transaction, their legal representatives and it must be established whether any of them is considered a Politically Exposed Person (PEP)¹⁵.


However, it is considered a warning signal¹⁶ to establish any type of link with government officials or entities, either directly or through partners, contractors or intermediaries and, for this reason, the due diligence process shall be intensified in accordance with the provisions of Annex 4 Counterparty Management of the Manual for the Self-Control and Integral Risk Management System for Money Laundering and Financing of Terrorism and Financing of Terrorism, Financing of Terrorism and Financing

¹³ Law 734 of 2002. ARTICLE 25. ADDRESSEES OF THE DISCIPLINARY LAW. Public servants are the addressees of the disciplinary law, even if they are retired from service (...). Law 1952 of 2019 ARTICLE 25. ADDRESSEES OF THE DISCIPLINARY LAW. Public servants are recipients of the disciplinary law, even if they are retired from the service (...).

¹⁴ Pursuant to Article 8 of Law 80 of 1993, paragraph f, public servants may not enter into government contracts on a personal basis.

¹⁵ Decree 830 of 2021 or any other decree that modifies or adds to it.

¹⁶ Manual for the Self-Control and Integral Risk Management System for Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction: Warning signs or early alerts are all those facts, situations, events, amounts, quantitative and qualitative indicators, financial ratios and other information determined as relevant, from which it can be inferred timely and/or prospectively the possible existence of a fact or situation that escapes from what is determined as normal or particular circumstances that call attention and justify further analysis.

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of the Proliferation of Weapons of Mass Destruction (SCI-M-002 or the one that modifies it) and the respective report shall be made to the channels established for such purpose (Business Ethics Line).

On a semi-annual basis, a report of the transactions carried out during the term shall be sent to the Corporate Vice-Presidency of Compliance - Monitoring Coordination, for its competence.

In addition to the above, if there are changes in the public servant with whom the relationship was initially established, the enhanced due diligence process must be performed again.

In cases where it is identified that the relationship will be established with a public servant who is also a Politically Exposed Person (PEP), an enhanced due diligence process must also be carried out with respect to this person and the Corporate Vice-Presidency of Compliance must be immediately informed through the ethics line in accordance with the provisions of the aforementioned Manual.

3.4.4. Gifts, attentions and hospitality

Ecopetrol employees are not authorized to give, offer, demand, request or accept gifts, hospitality, courtesies, meals, travel or other benefits outside the parameters defined in the Guide for the Management of Gifts and Hospitality (ECP-UEC-G-001 or the one that modifies it). Likewise, everything that is received and that is allowed in the regulations must be recorded and/or reported in the established information systems or formats, according to internal procedures.

3.4.5. Charitable contributions¹⁷

Charitable contributions are transactions that may be carried out by Ecopetrol S.A., based on the parameters set forth in Law 489 of 1998, Law 633 of 2000, Article 355 of the Political Constitution and other legislation in force on the subject.


However, not all charitable contributions are allowed. According to Article 355 of the Colombian Constitution, companies are expressly prohibited from making charitable contributions in favor of natural or legal persons under private law. Additionally, they cannot be used for the detour of money in favor of political activities or objectives unrelated to the company.

The charitable contributions is a legal act that implies the transfer of a good or right and requires two wills for its conformation, since the donor transfers the dominion over a thing and the donee has to accept it; therefore, it is not of the essence of the charitable contributions to expect a consideration.

Ecopetrol may make charitable contributions under the terms of article 355 of the Political Constitution, under the following parameters:

- In no case shall charitable contributions represent a commitment or have the intention of obtaining a specific benefit in exchange nor may they be used as a form of retribution.
- Prior to the charitable contributions, a due diligence process shall be carried out (standard or intensified in accordance with the provisions of the Manual for the Self-Control and Integral Risk Management System for Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction (SCI-M-002 or the one that modifies it), The company will also

¹⁷ Given the nature of Ecopetrol as a Mixed Economy Company, it is considered that these terms would be equivalent to charitable contributions. The foregoing considering that these, according to the Internal Revenue Services (U.S. federal Agency responsible for the collection of taxes and enforcement of tax law), correspond to a charitable contributions or gift to, or for the use of, a qualified organization. It is voluntary and is made without obtaining, or expecting to obtain, anything of equal value from qualified organizations.

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establish whether any of them is considered a Politically Exposed Person (PEP)¹⁸, and/or, if any warning signs are found, the respective report will be made to the channels established for such purpose (Business Ethics Line)¹⁹.

Charitable contributions made by the company and their values must be made public through effective channels, including the Integrated Sustainable Management Report published annually by the company in order to ensure transparency of information and mitigate risks.

Regarding the accounting management of this figure, the provisions of the Guide for the Accounting Management of charitable contributions, Contributions and Assignments without Cost of Ecopetrol S.A. must be followed. (GFI-P-093 or the one that modifies it).

3.4.6. Sponsorships

Ecopetrol carries out sponsorships²⁰ as a strategy to strengthen its reputation and brand exposure. In order to adequately manage these, the minimum requirements and prohibitions set forth in the Procedure for Planning, Authorization and Subscription of Sponsorships and Acquisition of Promotional Materials of Ecopetrol, and the Corporate Guide for Communications Management of the Ecopetrol Group (COM-P-001 or the one that modifies it) must be observed.

The minimum requirements to consider sponsorships are as follows:

- The person requesting the sponsorship must be a legal entity.
- The consideration granted by the person requesting the sponsorship must be clearly defined.
- The purpose of the sponsorship must be to promote the company's image and brand, as defined in Ecopetrol's Corporate Strategy and in the current Communications Strategy.
- The final value of the sponsorship will be determined by the application of the Sponsorship Matrix.


Prohibitions for sponsorships:

- Events, entities, institutes or activities that generate confrontation between groups of society or stakeholders of Ecopetrol and/or its Group.
- Events, entities, institutes or activities whose purpose is to promote alcohol or hallucinogenic substances.
- Events in which Ecopetrol's brand is negatively affected by its association with alcohol.
- Events, entities, institutes or activities in favor of any political candidate or current member of the national or territorial government.
- Events, entities, institutes or activities that are associated with products that may affect human health or endanger the lives of the attendees.
- Events, associations, entities, institutes or activities that have a political, ideological or religious orientation; or that promote discrimination of any kind.
- Events or activities that may be interpreted as an act of corruption under the terms of this Manual.
- Events whose main purpose is fundraising.
- Decorations, awards and recognitions to natural persons.

¹⁸ Decree 830 of 2021 or any other decree that modifies or adds to it.

¹⁹ The Manual for the Self-Control and Comprehensive Risk Management System for Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction indicates: "In cases in which it is identified that the counterparty represents a higher risk, or that it is a Politically Exposed Person (PEP), or that it is located in non-cooperating countries and high-risk jurisdictions, an intensified due diligence process must be advanced and the Corporate Vice-Presidency of Compliance must be immediately informed through the ethics line."

²⁰ Those entered into by Ecopetrol to achieve through a payment, the exposure and positioning of its image and brand in accordance with Ecopetrol's Corporate Strategy and Communications Strategy.

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In no case shall sponsorships represent a commitment or have the undue intent to obtain a specific benefit in return.

Prior to carrying out the sponsorship, a due diligence process shall be carried out (standard or enhanced in accordance with the provisions of the Manual for the Self-Control and Integral Risk Management System for Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction (SCI-M-002 or the one that modifies it), The report shall be made through the channels established for such purpose (Business Ethics Hotline), if any of them are considered PEP and/or if warning signs are found. On a semi-annual basis, the report of the sponsorships recommended in the period will be sent to the Corporate Vice-Presidency of Compliance - Monitoring Coordination, for its competence.

Sponsorships and their value must be made public through effective channels, including the Integrated Sustainable Management Report published annually by the company in order to ensure transparency of information and mitigate risks.

3.5. Corruption Prevention Activities in the Company

3.5.1. Identification and Evaluation of Risks and Controls

In Ecopetrol, corruption risk management is supported by the principles and processes established by Ecopetrol's Integrated Risk Management System (based on ISO 31000), the Internal Control System (based on the COSO model) and the management of the different types of risks of the Company.

For its processes, Ecopetrol operates a risk management cycle that is carried out at least once a year and every time it is required according to the nature or significant changes in the process. In this cycle, the organization has continuously identified the risks and designed the corruption controls and permanently monitors them, to prevent, detect and mitigate or correct situations of materialization of these, seeking to comply with the highest standards and references, as well as the applicable local and international legal provisions.


Corruption risk management includes the stages of identification, evaluation, treatment, follow-up, recording and reporting, and communication in accordance with the provisions of the Procedure for Process Risk Management in the Ecopetrol Group (GEE-P-005 or the one that modifies it).

3.5.2. Corruption Risk Management Planning

Elaboration of the Work Plan. Annually, a work plan is defined that contemplates the activities/stages described in this document, including the person(s) responsible, start and end dates, deliverables, required resources, tools to define how information is recorded and analyzed in each of the stages, definition of how the results will be disseminated to internal and external stakeholders, among others.

Evaluation of the Internal and External Context. Whenever it is necessary to identify, document and manage corruption risks in the processes and their mitigation measures and alerts, an analysis of the process to be reviewed must be carried out beforehand, in order to understand in detail the activities, interactions, results and other relevant information for the exercise.

3.5.3 Corruption risk identification

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The identification of corruption risks allows Ecopetrol, in a systematic and structured way, to determine the events that may negatively affect its objectives (strategic, operational, reporting, compliance) of the process. These events are considered, whether or not they are under the control of the organization.

During this phase, an analysis of the process under review is performed in order to understand in detail the activities, interactions, results and other information relevant to the exercise. In this sense, the execution of this stage ensures an adequate identification of corruption risks in the company's processes.

3.5.4. Corruption risk assessment.

Ecopetrol's corruption risk assessment methodology contemplates, among others, probability and impact²¹ measurement criteria, through a semi-quantitative analysis that seeks to prioritize risks by assigning values to these within predefined scales or ranges. This is achieved by estimating the probability of occurrence of the event and the impact of its consequences on resources (people, environment, economic, reputation, customers, among others), for inherent and residual risk levels.



Figure 1. Inherent and residual risk assessment

For this stage, the RAM risk assessment matrix is used, in which it is possible to visualize how the risks move on the heat map considering the effect of the treatment measures associated with them.


3.5.5. Treatment of corruption risk

At this stage, additional mitigation activities (controls or treatment actions) are defined in order to prevent the causes or protect against the consequences for those risks whose residual assessment is at unacceptable risk levels.

It is also feasible to define risk alerts or KRI (Key Risk Indicator) as measurement tools that allow monitoring, in a preventive manner, the behavior of the variables associated with corruption risks, generating early warnings that lead to strengthen or focus management to avoid their materialization.

The structuring of the treatment measures must follow the guidelines established in the documents: Procedure for the Management of Process Risks in the Ecopetrol Group (GEE-P-005 or that which modifies it) and Procedure for the Management of Controls and Treatment Actions in the Ecopetrol Group (GEE-P-006 or that which modifies it).

²¹ In line with what is established in the document "Strategies for the construction of the Anti-Corruption and Citizen Service Plan" of the Secretariat of Transparency.

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3.5.6. Corruption risk monitoring

The purpose of this stage is to follow up and periodically review the management of corruption risks in each of the stages that make up the cycle and its results. As part of the monitoring of the effectiveness of the "compliance" controls (which include those associated with corruption) that are part of the internal control system, the following are the actions taken to follow up on these risks:

- Continuous supervision (routine data analysis, preventive monitoring of processes, key risk indicators KRIs).
- Self-assessments (process owners).
- Process certifications (Top Management).
- Commitment to Transparency (declaration by all employees).
- Assessments by independent consultants (design and operability of controls).
- Compliance Program Supervision (JD Audit Committee).
- Internal Audit Plan (PGA).

3.5.7. Corruption risk management record and report

Corruption risk management, as well as its results, are documented and reported through the mechanisms defined in the organization. Among these mechanisms are: Working Paper, Construction of Risk and Controls Matrix, Risk Assessment Matrix, Risk and Controls Matrix of the processes, Results of the Internal Control Self-Assessments, Management Tests, Internal and External Audits, among others.


3.5.8. Corruption risk management communication

Communication in corruption risk management is an interactive process of information exchange that allows socializing results, sharing data, opinions and perspectives, facilitating the proper flow of information and dialogue among stakeholders or parties involved. This is carried out at each stage of the process risk management cycle jointly with the Company's areas and processes.

3.6. Training, Formation and Communication

The Corporate Vice-Presidency of Compliance carries out corruption prevention activities, including the following:

- Regular training to members of the Board of Directors in risk management and anti-corruption practices. Training, capacity building and permanent, general and focused communications to senior management, all employees, areas of special risk and counterparties. This training, in addition to disseminating the ethical guidelines of the Business Group, seeks to promote the establishment of Compliance Programs for counterparties.
- Induction of new employees in the organization's ethical guidelines and principles. Mandatory virtual courses for training in Integrity, Transparency, Ethics and Compliance, Anti-Corruption and Risk Management and Internal Control.
- The annual commitment to Transparency by the company's employees, including senior management, through which the knowledge and application of the Code of Ethics and Conduct, Anti-Fraud Manual, Anti-Corruption Manual and Manual for the System of Self-Control and Integral Risk

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Management of Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction, as well as other internal ethics and compliance regulations, are evaluated. Through this instrument the subscribers ratify their rejection of acts of corruption, local bribery, transnational bribery and fraud and undertake to comply with the provisions of the Code of Ethics and Conduct. They also state that they have completed the Ethics and Compliance Course.

Additionally, periodic training is provided to Ecopetrol's critical positions, grouped according to the nature of the risks to which they are exposed, in order to achieve a focused training that adjusts to the characteristics of the activity performed.

3.7. Duty to Report Acts of Corruption and Whistleblower Protection

Any employee or third party who suspects a corrupt activity must immediately notify the company through the whistleblower channel, which is managed by a third party independent from the company, in such a way that the secure and confidential treatment of the information is guaranteed, and the identity of the whistleblower is protected, who may even choose to remain anonymous.

In Ecopetrol, retaliation against the whistleblower is rejected as indicated in the Procedure for the Management of Ethics and Compliance Issues in the Ecopetrol Group (VEI-P-001 or the one that modifies it) and even, in case of threats against the physical integrity of the whistleblower, the Guide for the Protection of Employees is applied. Notwithstanding the above, in accordance with the provisions of the legal system, accompaniment may be provided in the respective proceedings before the respective authorities.

3.8. Duty to Collaborate with Authorities

Ecopetrol and its employees will collaborate with the authorities when required in the investigations that they carry out in the timely attention of requirements and any other methodology that the authorities consider pertinent.²²


3.9. Roles and Responsibilities for Compliance with the Anti-Corruption Manual

3.9.1. Board of Directors and Senior Management

The Board of Directors, the Audit and Risk Committee of the Board of Directors and the President of Ecopetrol, exercise specific functions provided for in the Company's Bylaws, the legal system, international and internal regulations that are aimed at preventing corruption as well as the exercise of the ethical leadership that, according to the Code of Ethics and Conduct, corresponds to them.

Additionally, the Audit and Risk Committee of the Board of Directors has functions related to internal control and compliance with the Code of Ethics and Conduct and its regulations indicate that they must know and follow up on the reports submitted by the Corporate Vice-Presidency of Compliance on allegations of corruption, supervise the function of regulatory compliance and prevention of corruption, verify the establishment of the risk management system and analyze the corporate risk map. Likewise, this committee is aware of and follows up on the management of ethical and corruption complaints from subordinates.

²² Among the mechanisms provided for attention to authorities are, but not limited to, the Guide for attention to requirements of the Office of the Comptroller General of the Republic and the Guide for Attention to the Office of the Attorney General of the Nation.

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Ecopetrol's bylaws expressly state the adoption of a zero tolerance policy against acts of corruption, fraud, bribery, violations to the Foreign Corrupt Practices Act ("FCPA"), and the rejection of acts such as facilitation payments, contributions and political donations, and charitable contributions that do not comply with the requirements of the Colombian Constitution, activities and payments for lobbying services, anti-competitive and monopolistic practices, and any behavior that may constitute a violation of the Colombian Constitution and local and foreign laws, insofar as applicable.

In turn, according to the bylaws, the President of Ecopetrol must establish and maintain the Internal Control System of the Company and lead the policy of zero tolerance to acts of corruption and ensure the effective implementation and sustainability of the Compliance Program.

Finally, in its bylaws, Ecopetrol commits to have, within its organizational structure, an independent area that guarantees the adoption and management of the Compliance Program, the Internal Control System, the Integrated Risk System and that promotes its application and articulation in Ecopetrol and the companies of the Ecopetrol group, with functional reporting to the Audit and Risk Committee of the Board of Directors.

3.9.2. Corporate Vice-Presidency of Compliance


In compliance with the provisions of the bylaws, Ecopetrol has, within its organizational structure, the Corporate Vice-Presidency of Compliance, an independent area that leads and manages the Compliance Program, the Internal Control System, the Integrated Risk System, promotes its application and permanent articulation between Ecopetrol and the companies of the Ecopetrol Group. It has a functional report to the Audit and Risk Committee of the Board of Directors.

This Vice-Presidency is in charge of the implementation of the Compliance Program whose specific objectives are:

- i. Consolidate an ethical culture in the organization, under the principles of the Code of Ethics and Conduct (integrity, responsibility, respect and commitment to life).
- ii. Identify and manage the company's compliance risks and ensure its controls, with special emphasis on those associated with fraud, corruption, bribery, money laundering, financing of terrorism, proliferation of weapons of mass destruction, violations of the Code of Ethics and Conduct and anti-bribery regulations, such as FCPA, Law 1778/2016, among others, in order to mitigate the impacts of their materialization.
- iii. Promote the proper execution of the processes required for the development of business, in order to avoid the materialization of risks arising from failures in controls.
- iv. To support compliance with the strategic objectives of the Ecopetrol Group and ensure the reasonableness of the financial statements.
- v. Generate confidence in the company from investors, society, stakeholders and the public in general.

The compliance program is supported by 4 components that seek to mitigate the materialization of corruption events. These components are: prevention, detection, response and continuous improvement.

Prevention: Through this component we seek to prevent the materialization of corruption events by executing the following activities:

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- Training and capacity building on ethics and compliance issues.
- Availability of an ethics hotline where potential corruption events can be reported confidentially and anonymously (if required by the whistleblower).
- Design of communications to sensitize staff on ethics and compliance issues.
- Follow-up and monitoring of activities susceptible to corruption events.
- Assurance of controls and the risk management cycle
- Company participation in collective action initiatives aimed at combating corruption.

Detection: This component of the compliance program seeks to effectively detect those corruption events that could not be prevented. The following activities are carried out to detect corruption events:

- Ethics checks
- Disciplinary investigations
- Cooperation with control agencies

Response: The response component refers to making coherent and consistent decisions in those situations in which it is confirmed, through detection, that corruption events have occurred. The response is ensured through the following activities:

- Corrective actions
- Ethical sanctions
- Disciplinary sanctions
- Contractual actions

Continuous improvement: The continuous improvement process seeks to identify whether the occurrence of corruption events is due to failures in the design of processes or controls. The following activities are carried out within this component:


- Adjustment of controls
- Redesign of processes
- Regulatory updating
- Strengthening of competencies and management tools.

3.9.3. Process owners and workers are responsible for:

- Identify and evaluate corruption risks in operations, businesses or contracts under their responsibility.
- Establish and implement controls for the prevention of acts of corruption.
- Raise dilemmas and consultations before the ethics line necessary to obtain advice and file complaints when they have knowledge of facts related to corruption, even if it has not been configured.
- Support and document operations, businesses, transactions and activities under their responsibility.
- Participate in training activities and training in the prevention of these risks.
- Not tolerate or facilitate acts that constitute corruption risks.

3.9.4. Counterparties are also responsible for:

- Identify, evaluate, control, manage and monitor potential corruption risks in the development of their activities with Ecopetrol.
- Document operations and have records of transactions carried out with the Ecopetrol Group.

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- Consult through the business ethics line when they require advice regarding this type of risk, report facts that may generate warning signs through this same means and denounce acts of corruption of which they become aware, even if these facts do not materialize.
- Participate in training activities and training in the prevention of these risks.

3.10. Sanctions

Failure to comply with this Manual may result in contractual consequences and may be subject to disciplinary, criminal, labor, fiscal sanctions or may result in national and international authorities initiating investigations and sanctioning the company or persons who have failed to comply with anti-bribery laws.

Ecopetrol will provide all necessary cooperation in the investigations carried out by these authorities.

3.11. Normative Reference and Doctrine

Law 1778 of 2016

Law 1474 of 2011 (Anti-Corruption Statute).

Law 734 of 2002 (Unified Disciplinary Code)

Substantive Labor Code

Colombian Criminal Code

Law 412 of 1997 approving the IACC in Colombia.

Law 970 of 2005 ratifying the UNCAC in Colombia.

United States Foreign Corrupt Practices Act (Foreign Corrupt Practices Act - FCPA)

Sarbanes Oxley Act

UK Bribery Act

Anti-Corruption Ethics and Compliance Handbook for Business ("OECD Handbook"). OECD, UNODC and World Bank, 2013.

Business Principles for Countering Bribery, Transparency International, 2013.


Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide, United Nations 2013.

Anti-Corruption Guide for Companies based on the Anti-Corruption Statute - UNODC, CCB, Ministry of Justice and British Embassy in Colombia.

How and why implement a Business Anti-Corruption Compliance Program? Secretary of Transparency, 2016.

4. CONTINGENCIES

Not applicable

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