



20
25

**SUPPLY
CHAIN**

**SUSTAINABILITY
ASSESSMENT**

Table of Contents



CHAPTER	PAGE
SUPPLIER CODE OF CONDUCT.....	<u>3</u>
SUPPLIER ESG PROGRAM.....	<u>15</u>
SUPPLIER SCREENING.....	<u>23</u>
KPIS FOR SUPPLIER SCREENING.....	<u>28</u>
SUPPLIER ASSESSMENT AND DEVELOPMENT.....	<u>31</u>
KPI SUPPLIER ASSESSMENT AND DEVELOPMENT	<u>45</u>
LOCAL EMPLOYMENT.....	<u>48</u>



SUPPLIER

CODE OF CONDUCT

Orgullosamente
ECOPETROL

Supplier Code of Conduct



CODE OF ETHICS AND CONDUCT FOR SUPPLIERS, CONTRACTORS, SUBCONTRACTORS, AND ALLIES

This document embodies Ecopetrol S.A.'s unwavering commitment to fostering ethical, transparent, and sustainable practices across its entire value chain. Grounded in principles of integrity, respect for human rights, environmental stewardship, and social responsibility, the Code of Ethics and Conduct serves as a cornerstone for building trust and accountability with suppliers, contractors, subcontractors, and allies; through these guidelines, Ecopetrol reinforces its dedication to not only achieving business excellence but also driving meaningful contributions to the well-being of communities and ecosystems.

Ecopetrol demands the highest standards of ethical behavior, encouraging all stakeholders to act with honesty, fairness, and diligence in every aspect of their work; by adhering to this Code, suppliers and partners commit to upholding these values, ensuring compliance with international best practices and local regulations while advancing shared goals of sustainability and inclusivity.

The document reflects Ecopetrol's holistic approach to creating value—one that harmonizes economic growth with environmental conservation and the promotion of social equity.

Some of the specific principles and commitments defined by the Code, are described below:



FORCED LABOR

The Code strictly prohibits forced, bonded, or involuntary labor in any form. Suppliers and contractors must ensure that all work is conducted freely, and employees have the right to leave employment after reasonable notice. Ecopetrol enforces this commitment by requiring detailed audits, robust whistleblowing mechanisms, and compliance assessments to eliminate any risks associated with forced labor practices.



CHILD LABOR

Ecopetrol enforces a zero-tolerance policy against child labor. Suppliers and contractors are required to adhere to local labor laws and international conventions, ensuring no individual under the legal working age is employed. The company collaborates with local communities to create educational programs and initiatives that protect children's rights and ensure they are not subjected to exploitative labor practices.

Supplier Code of Conduct



WORKING CONDITIONS

Suppliers and contractors must provide fair and dignified working conditions, including reasonable working hours, appropriate wages, and benefits as per local laws and industry standards. Ecopetrol advocates for periodic evaluations of workplace conditions, ensuring all work environments are conducive to the mental and physical well-being of employees. The company provides resources and training to help its partners maintain and improve workplace standards.



OCCUPATIONAL HEALTH AND SAFETY

The Code underscores the importance of preventive measures to ensure occupational health and safety. Suppliers and contractors must adopt industry best practices, comply with local regulations, and report incidents transparently. Ecopetrol emphasizes creating a proactive safety culture, including continuous monitoring, safety training programs, and investment in state-of-the-art protective equipment to minimize workplace risks.



DISCRIMINATION AND HARASSMENT

Ecopetrol prohibits any form of discrimination or harassment based on gender, ethnicity, religion, political affiliation, or other personal attributes. Suppliers and contractors must foster inclusive and respectful workplaces, ensuring all employees are treated equitably and protected from harassment. The Code includes explicit guidelines for reporting and addressing complaints, supported by training to raise awareness about diversity and inclusion.



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The Code supports employees' rights to freedom of association and collective bargaining, as outlined in international conventions. Suppliers and contractors must respect these rights and facilitate dialogue between workers and management without retaliation or discrimination. Ecopetrol monitors compliance through stakeholder engagement and encourages open communication to resolve disputes constructively.



GREENHOUSE GAS EMISSIONS AND ENERGY CONSUMPTION

Suppliers and contractors are required to monitor, report, and mitigate greenhouse gas (GHG) emissions in their operations. Energy efficiency measures must be implemented to align with Ecopetrol's climate goals and contribute to a lower carbon footprint. Ecopetrol provides technical support, sets reduction targets, and encourages innovation in renewable energy solutions to reduce emissions across its supply chain.

Supplier Code of Conduct



POLLUTION PREVENTION AND WASTE MANAGEMENT

Suppliers and contractors must adopt rigorous practices to minimize pollution and manage waste responsibly. This includes implementing technologies to reduce emissions and adopting strict measures for the proper disposal and treatment of hazardous and non-hazardous waste. Ecopetrol collaborates with its partners to ensure the adoption of circular economy principles, promoting recycling, reusing materials, and reducing landfill dependency. Furthermore, initiatives such as cleaner production methods, pollution audits, and awareness campaigns are integral to reducing environmental impact. Ecopetrol also enforces strict guidelines for water management to prevent contamination of water sources and requires partners to report regularly on waste handling and pollution control efforts. These measures aim to ensure the protection of ecosystems and community health.



RESOURCE EFFICIENCY

Efficient use of natural resources is mandatory. Suppliers and contractors are encouraged to integrate circular economy principles, reduce resource consumption, and implement innovative methods to optimize materials, energy, and water use. Ecopetrol supports projects that emphasize resource conservation, such as energy recovery systems, water recycling facilities, and sustainable procurement practices. These efforts aim to create a balance between operational demands and environmental stewardship.



BIODIVERSITY, NO DEFORESTATION, AND LAND CONSERVATION

Suppliers and contractors must protect biodiversity and adhere to land conservation practices. Activities that contribute to deforestation or harm ecosystems are strictly prohibited. Ecopetrol actively invests in reforestation projects and biodiversity conservation initiatives, working closely with local communities to restore natural habitats. The company's policies emphasize the need for environmental impact assessments before initiating projects and promote sustainable land use practices to maintain ecological balance.



ANTI-CORRUPTION AND CONFLICT OF INTEREST

Ecopetrol has a zero-tolerance policy towards corruption, bribery, and fraud. Suppliers and contractors are prohibited from offering, accepting, or engaging in any form of bribery. Conflicts of interest must be disclosed and managed transparently, ensuring decisions are made in Ecopetrol's best interest. Regular training programs, rigorous due diligence processes, and clear contractual clauses are in place to uphold ethical practices and protect against corruption risks.

Supplier Code of Conduct



ANTI-COMPETITIVENESS

Suppliers and contractors are required to uphold free and fair competition. Practices such as collusion, market manipulation, or price-fixing are strictly forbidden. Ecopetrol ensures that procurement and contracting processes are conducted with fairness and impartiality, fostering trust and accountability within its supply chain. Compliance audits and independent evaluations are conducted to detect and deter anti-competitive behaviors.

Ecopetrol's Code of Ethics and Conduct establishes a robust framework to ensure ethical, sustainable, and transparent practices throughout its supply chain. Compliance is mandatory, and violations may result in contractual and legal consequences. By adhering to these principles, suppliers, contractors, and allies contribute to Ecopetrol's mission to drive excellence and sustainability in its operations.

Additionally, in 2024, Ecopetrol deployed the sustainability decalogue that contemplates the following management aspects:

SUSTAINABILITY DECALOGUE

- 1 Promote self-care and protection actions for everyone, both within and beyond the workplace, emphasizing the importance of safeguarding life and the environment.
- 2 Actively reject corruption in all its forms, including bribery, fraud, and any conduct that compromises integrity or ethical frameworks. Ensure timely disclosure of conflicts of interest and ethical concerns.
- 3 Ensure free, healthy, and fair competition in the procurement of goods and services while acting with corporate responsibility and respect for human rights. Create diverse, equitable, and inclusive workplaces free from discrimination and harassment, including sexual harassment.
- 4 Provide fair and adequate working conditions, rejecting forced labor, child labor, and any illegal or degrading practices.
- 5 Safeguard individuals who report misconduct in good faith, ensuring protection from retaliation. This includes reports of workplace harassment, sexual harassment, or discrimination.
- 6 Conduct operations in compliance with current regulations to protect and preserve the environment.
- 7 Understand the greenhouse gas emissions generated in operations and explore alternatives to mitigate or compensate for them.
- 8 Promote eco-design principles to minimize and utilize waste while extending the lifecycle of goods through reuse, remanufacturing, and repair.
- 9 Advocate for efficient water use to minimize negative impacts on water bodies and support actions that enhance water security in territories.
- 10 Ensure goods are sourced from legal and sustainable origins while respecting biodiversity and ecosystem services.



Supplier Code of Conduct



Ecopetrol also counts with a Code of Ethics and Conduct defines the standards of conduct expected by the organization and guide the actions of Ecopetrol S.A., of the Group Companies and of all the recipients of the Code, pursuant the highest ethical principles of integrity, responsibility, respect and commitment to life.

The accountability of the Code covers the activities and conduct of Ecopetrol´s suppliers and contractors, as it is mentioned on the official document. Therefore, the knowledge and application of this Code will be mandatory for the suppliers working alongside the Company or any of its subsidiaries, who must ensure that their actions are always framed within its rules.

PRINCIPLES OF ECOPETROL ´S CODE OF ETHICS AND CONDUCT:



INTEGRITY

Some of the actions or behaviors expected for this principle are:

- ✓ Work with righteousness, loyalty, justice, honesty, and transparency.
- ✓ Impartiality in the decisions and actions, not intending to seek privileges, or personal benefits.
- ✓ Report conflicts of interest, inabilities, and incompatibilities.
- ✓ Zero tolerance to events implying compliance risks.

(fraud, bribery, corruption, money laundering, terrorist financing, violation of the FCPA)



RESPONSIBILITY

Some of the actions or behaviors expected for this principle are:

- ✓ Responsibility of actions and omissions and compliance with local and international regulations and internal provisions applicable to the activities executed.
- ✓ Compliance with the internal and external regulations applicable, the internal work regulations, the culture principles and agreed obligations, and its enforcement.
- ✓ Accountability of mitigating business and activity risks, abiding by the pertinent controls and its respective execution.



RESPECT

Some of the actions or behaviors expected for this principle are:

- ✓ Not discrimination or harassment for being of different sex, orientation, race, national or family origin, language, gender, religion, political or philosophical opinion, disability situation, or any other situation that goes against the diversity and inclusion policy adopted by Ecopetrol.
- ✓ Rejection any act of sexual harassment at work.
- ✓ Promotion of equality among my colleagues and the rejection of unfair competition.



COMMITMENT TO LIFE

Some of the actions or behaviors expected for this principle are:

- ✓ Respect and promotion of human rights.
- ✓ Protection of the environment, preservation and improvement of environment and the social milieu.
- ✓ HSE policies compliance and enforcement; reporting incidents related to non-compliance with HSE rules.












Supplier Code of Conduct



Ecopetrol has voluntarily signed the Global Compact of the United Nations, an initiative that promotes the commitment of the private and public sector and the civil society to align their strategies and operations with ten principles that are accepted universally on three thematic areas: Human rights and labor standards, Environment, and Business ethics:

HUMAN RIGHTS AND LABOR STANDARDS:

Ecopetrol acts in a proactive and differentiated manner through the contractual and commercial relationships with its suppliers to respect, **promote and guarantee the following rights and freedoms:**

-  Life, integrity and personal liberty.
-  Freedom of union association and collective bargaining.
-  Elimination of forced and compulsory labor.
-  Abolition of any form of child labor.
-  Dignified, favorable and adequate working conditions.
-  Equality and elimination of discrimination in employment and occupation.
-  Health and safety at work.
-  Participation of ethnic groups through prior consultation.
-  Collective and environmental rights.
-  Freedom of expression.
-  Privacy and protection of information and personal data.

Ecopetrol ratifies its committed to the promotion, respect and assurance of Human Rights, guided by Political Constitution, the applicable national regulations, as well as Ecopetrol's Human Rights Guide in which the Company adheres to:



United Nations Guiding Principles on Business and Human Rights



Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of ILO



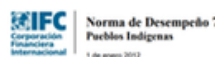
Ten Principles of United Nations Global Compact



Voluntary Principles on Security and Human Rights



OECD Guidelines for Multinational Enterprises



Performance standard 7 - Indigenous People of the International Finance Corporation (World Bank)








Useful Facts:

Ecopetrol has the Human Rights and Business Guide which determines the elements that lead Ecopetrol's management in Human Rights Aspects aligned with the standards established in the universal, inter-American and national Human Rights Systems, directly related to business activities, these commitments are extensive to workers, suppliers, partners, and other actors with a contractual or commercial relationship with Ecopetrol.

Supplier Code of Conduct



Ecopetrol recognizes the importance of the commitment with International Human Rights Law not only by its own operation but also its suppliers performance since their actions impact territories and communities where Ecopetrol operates. Therefore, it implemented the strategy of declaration, promotion, and appropriation of Human Rights, promoting in its suppliers and workers:

-  Have a public declaration of respect and promotion of Human Rights and commitment to Diversity, Equity, and Inclusion.
-  Implement practices or processes to prevent negative impacts on Human Rights, generated by the principle of due diligence.
-  Promote respect for Labor Rights: decent, favorable and adequate working conditions, freedom of union association and collective bargaining, equality in employment and occupation, equal remuneration, abolition of any form of child labor, prohibition of human trafficking and of slavery, among others.
-  Have practices to promote Diversity, Equity, and Inclusion, and prevent any form of violence, sexual harassment, workplace harassment or discrimination, with special consideration for vulnerable population groups that face greater barriers to social and labor inclusion.
-  Strengthen prevention mechanisms for care and situations that affect Human Rights, violence, discrimination or sexual or workplace harassment.



Ecopetrol also counts with internal polices, guidelines and normative which seeks to strengthen the supplier 's commitment with this crucial thematic:

DOCUMENT	SUMMARY	PUBLIC LINK
Guide for labor aspects in activities contracted	Occupational aspects and conditions that must be taken into account in the planning, allocation, execution, balance and closing of a contract that requires the development of personnel by the contractor through the contractor and with exclusive dedication to the contract with Ecopetrol. In addition, it emphasizes respect and promotion of human rights and labor rights and encourages labor inclusion of people who have difficulties to access the labor market.	LEARN MORE
Human Rights and Business Guide	Determines the elements that lead Ecopetrol' s management in Human Rights Aspects	LEARN MORE
Guide for Diversity, Equity and Inclusion	Policy and principles of action in Diversity, Equity and Inclusi in the development of the activities contracted by Ecopetrol and its commercial relationships.	LEARN MORE
Annex On Human Rights And Corporate Social Responsibility	Commitment to human rights and corporate social responsibility	LEARN MORE
Annex on Human Rights and Diversity, Equity and Inclusion	Establish the respect of Human Rights and promotion of Diversity, Equity and Inclusion in the development of the activities contracted by Ecopetrol	LEARN MORE
Guide of HSE Requirements for the Planning and Performance of Contracts at Ecopetrol S.A.	Establish the HSE requirements and obligations (occupational health and safety, and environment) in all phases of the supply management process; so that an adequate and consistent execution of the activities responsible for contractors is ensured.	LEARN MORE

Supplier Code of Conduct



Ecopetrol is strongly committed to the preservation of the environment, therefore it declares its responsible management in the following aspects, among others:

-  Efficient use of energy and natural resources.
-  Reduce greenhouse gas emissions.
-  Waste management.
-  Comprehensive water management in operations.
-  Generates environmental awareness.
-  Monitors continually the effects of climate change through the HSE management system.
-  Prioritize safety at work and in the environment, to protect the integrity of people, facilities, and areas where operations are performed.
-  Compliance of environmental policies, standards, procedures, laws, and applicable regulations.

ENVIRONMENTAL SUSTAINABILITY PROGRAM:

The Supply Chain Management counts with the Environmental Sustainability Program which seeks to generate an environmental awareness on Ecopetrol's Suppliers, in 4 postulates:



DECARBONIZATION

Ecopetrol applies the decarbonization cycle with its value chain, impacting Scopes 1, 2 and 3 of the company's Greenhouse Gas -GHG- emissions inventory. The decarbonization cycle starts collecting GHG emissions data from suppliers, achieving decarbonization goals commitment for contracts, and implementing reduction and compensation emissions initiatives with suppliers.



MATERIALS AND WASTE

Ecopetrol adopted its circular economy model for its supply chain which seeks to prolong the life cycle of the acquired materials and minimizing waste generation. Therefore, the purchases or services contracted must be aligned with at least one of the following objectives:

- Reduce non-renewable virgin materials.
- Optimize the potential reuse of products and components, through reuse, remanufacturing and/or repair processes, as well as inclusion of buy backs agreements in contracting processes.
- Optimize the recycling of products and materials, by incorporating options for waste management.



NATURAL CAPITAL / BIODIVERSITY

Ecopetrol is looking to involve the supply chain into the Net Zero Deforestation Goal, through the commitment to the Intersectoral Pact for Legal Wood in Colombia and the legality of the source of the wood to be used for the activities with intensive use of wood, prioritizing categories of goods and services such as: Construction, Facilities maintenance, Packaging, Stationery and Logistics.

Supplier Code of Conduct



ZERO WATER DISCHARGES

In the zero water discharges roadmap, Ecopetrol reports and achieved the certification of its direct water footprint in big four assets. Ecopetrol is engaging the supply chain through the indirect water footprint, prioritizing the categories of goods and services with intensive use of critical materials and waste management, such as: Supply of Chemicals, Drilling, completion and subsoil services, Drills, Supply of Steel Pipe, Supply of raw materials and waste management.



**MORE
INFO** >>

Ecopetrol also counts with internal polices, guidelines and normative which seeks to strengthen the supplier 's commitment with this crucial thematic:

DOCUMENT	SUMMARY	PUBLIC LINK
Decarbonization Clause	Establish different decarbonization options: estimation and reduction goal	> LEARN MORE
Guide for Comprehensive Waste Management and Zero Waste at Ecopetrol S.A.	Establish guidelines and responsibilities for the comprehensive management of waste generated in accordance with current legal regulations and the pillars of Waste Management and Circular Economy; through strategies of reduction, reuse, use and monetization of waste focused on the Zero Waste Management System.	> LEARN MORE
Guide of HSE Requirements for the Planning and Performance of Contracts at Ecopetrol S.A.	Establish the HSE requirements and obligations (occupational health and safety, and environment) in all phases of the supply management process; so that an adequate and consistent execution of the activities responsible for contractors is ensured.	> LEARN MORE
Supplier obligatoin in HSE aspects (Industrial and Process Safety, Occupational Health and Environment)	This document details the supplier's HSE obligations and specifies the minimum environmental management expected by Ecopetrol, with guidelines regarding legal compliance, materials and waste management, water, biodiversity, noise and emissions of pollutants into the air.	> LEARN MORE

Supplier Code of Conduct



The actions and tasks developed by Ecopetrol's suppliers and its employees must be characterized by transparency and ethical behavior; with total rejection and zero tolerance of any conduct that contravenes the postulates defined and adopted in the Ethics and Conduct Code.



ANTI-CORRUPTION AND CONFLICT OF INTEREST:

- Regime of inabilities, incompatibilities, and prohibitions applicable to current or former public servants, such as conflict of interest and ethical conflicts.
- Prohibition of bribery and other forms of corruption
- Integrity of accounting
- Act against money laundering and terrorist financing (AML/CTF)
- Prohibitions of gifts, entertainment, and hospitality



ANTI-COMPETITIVENESS

- Rejection of any practice that promotes monopoly and that limits or violates free competition.
- Protection of copyright and intellectual property is promoted.

ETHICS, TRANSPARENCY AND DUE DILIGENCE

The supply management comprises a business ethics framework strengthened by high standards, mainly based in **3 fundamental pillars**:



Human resource monitoring



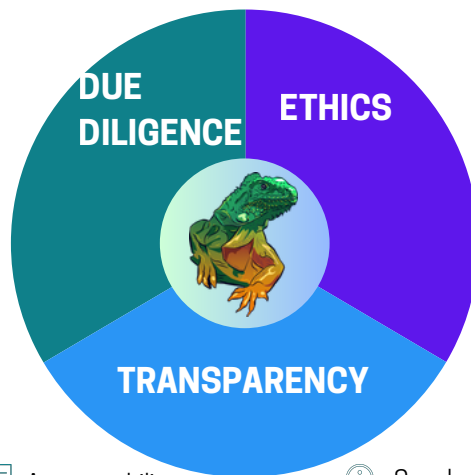
Commercial and Labor Assurance



Counterparty verification



Supply chain risk management and controls



Ethics and Conduct Code



Strengthening of the requirements and accomplishment of Corporate regulations



Assurance of completion in due form of compliance, ethics and transparency formats.



Accountability



Supply chain information disclosure



Corporate model



Roles and responsibilities segregation

Looking to promote these 3 fundamental pillars, the process implemented high standards in this matter aligned with the Ethics and Conduct Code preserving the corporate principles and values in all the phases of process.

Supplier Code of Conduct



Ecopetrol also counts with internal polices, guidelines and normative which seeks to strengthen the supplier´s commitment with this crucial thematic:

DOCUMENT	SUMMARY	PUBLIC LINK
Rules of Ethics, Transparency and Compliance	The supplier declares that he knows and accepts the rules of ethics, transparency and compliance of Ecopetrol, such as provisions on conflicts of interest and ethical conflict, that its resources do not come from illegal activities, not to carry out illicit transactions or operations, or with people, companies or countries included in the restrictive lists of the OFAC or the United Nations, not participating in restrictive practices of competition or unfair competition and compliance with regulations on prevention and control of money laundering, financing of terrorism and proliferation of weapons of mass destruction applicable	LEARN MORE
Obligations of Ethics, Transparency and Compliance in contracting	The supplier declares the compliance with the provisions of the Good Governance Code, the Code of Ethics and Conduct, and the internal regulations relating to ethical and compliance issues, anti-bribery laws, accounting standards and adoption of internal controls, not being involved in conflicts of interest, ethics, inabilities and incompatibilities, the rejection of sexual harassment and the acceptance of the right of termination for non-compliance that Ecopetrol has for any violation of anti-bribery laws, the Code of Ethics and Conduct or the obligations provided for in the guidelines of ethics and compliance, among others.	LEARN MORE
Commitment to Contractual Integrity	Ratificación del conocimiento por parte de los proveedores de los parámetros legales y regulatorios que aplican en su relación con Ecopetrol y compromiso con la aplicación del Código de Ética y Conducta, manuales anticorrupción, antifraude, LA/FT e instructivos sobre conflictos de conflicto de intereses y ético, y demás normas internas encaminadas a prevenir riesgos de cumplimiento, a lo largo de la relación contractual.	LEARN MORE
Corporate Governance Code	Ecopetrol's Corporate Governance Code incorporates the best corporate practices for transparency, governability, and control to generate trust among stakeholders and the market. All acts undertaken by the company Board of Directors, Company Chairman, employees, contractors and contractor's employees, shareholders and investors, are included in the overall framework and provisions set out by this Code, so company government can develop its business activity framed within principles of transparency, Corporate governance and control over the business management.	LEARN MORE
LA/FT and shareholding statement	Certificate of compliance with the guidelines for the Prevention of Asset Laundering and Financing of Terrorism, established by ECOPETROL S.A, as well as shareholding information.	LEARN MORE



SUPPLIER

ESG PROGRAM

Orgullosamente
ECOPETROL

Supplier ESG Program












OVERSIGHT OF IMPLEMENTATION

BOARD OF DIRECTORS

The Board of Directors is the Administrative body of Ecopetrol and is made up of nine (9) main members without substitutes, who are elected by the General Shareholders' Meeting in the terms established in the Bylaws.

BOARD OF DIRECTORS MEMBERS

 Ángela María Robledo Independent, member since March 23, 2024	 Tatiana Roa Non independent, member since March 26, 2024	 Mónica De Greiff Independent, member since October 24, 2022	 Gonzalo Hernández Non independent until April 30, 2024. Independent since May 1st, 2024. Member since October 24, 2022.	 Luis Alberto Zuleta Independent, member since March 11, 2023. He presented his resignation on August 30, 2024, which became effective on November 9, 2024.	 Edwin Palma Non independent, member since March 27, 2024 until March 6, 2025, effective date of his resignation.	 Guillermo García Independent, member since March 26, 2024	 Álvaro Torres Independent, member since March 27, 2024	 Juan José Echavarría Independent, member since March 31, 2023. He presented his resignation on August 30, 2024, which became effective on November 9, 2024.
---	---	--	--	---	--	--	---	--

To directly address its responsibilities, the Board of Directors has six permanent institutional committees and one temporary committee, composed of members of the Board of Directors appointed by the Board itself. One of these is the Corporate Governance and Sustainability Committee, which supports the Board of Directors' management of the Company's good governance and sustainability. Its purpose is to recommend systems to the Board of Directors for the adoption, monitoring, and improvement of corporate governance and sustainability practices.

In 2025, the Supplier ESG Program was consolidated, aiming to identify and assess potential ESG risks and opportunities, and to plan measures that ensure strong sustainability performance throughout the supply chain. The program is aligned with the United Nations Sustainable Development Goals and international best practices, evaluated through global benchmarks such as DJSI and CDP, ensuring integration with Ecopetrol's 2040 strategy "Energía que transforma" by managing the Responsible Supply Chain as a material issue.

The Supplier ESG program was presented to and approved by Ecopetrol's Board of Directors during the Corporate Governance and Sustainability Committee, with the commitment to monitor the goals and achievements on an annual basis (at least once a year) to this body.

To ensure the proper implementation and achievement of the established goals, Ecopetrol's Supplier ESG Program is executed through four thematic pillars aimed at fostering comprehensive commitment to sustainable management throughout the entire Procurement Process. These pillars seek to identify the specific characteristics of direct, indirect, and potential suppliers in order to implement differentiated engagement mechanisms focused on value creation, risk identification and management, and the promotion of plurality and local sourcing.

Additionally, the pillars aim to develop capabilities among internal and external stakeholders to address the evolving needs of the market, consolidating cutting-edge competencies supported by international benchmarks and monitoring tools that drive continuous improvement and contribute to achieving the overarching ambition of becoming a reference in the industry.

Supplier ESG Program



SUPPLIER ESG PROGRAM STRUCTURE

01 Comprehensive Commitment
ESG management structurally present throughout the entire Supply Chain process.

04 Measurement and Continuous Improvement
Measurement and Continuous Improvement ESG performance objectives that enable alignment and compliance with industry best practices.



02 Internal Strengthening and Suppliers Empowerment
Development of internal and external ESG capabilities.

03 Differentiated Supplier Management
Identification and management of specific characteristics of tier 1, non tier 1, and potential suppliers.

GOVERNANCE MODEL: REVIEW OF PURCHASING PRACTICES

The Supply Chain management counts with a strong Governance Model for the review, approval, and monitoring of the different procurement strategies, and assure its alignment to the business objectives, the commitment to ethics and transparency, and the sustainable (ASG) management of the Function.

SUPPLY STRATEGIES COMMITTEE



OBJECTIVE

Review, approve and monitor the procurement strategies for goods and services contracting.



RESPONSIBILITIES:

- Approve the procurement strategies, whose defined source has been the strategic Supply.
- Promote the search, analysis, and incorporation of good supply practices.
- Promote demand aggregation as a Business Group; the aggregation or disaggregation of demand that enables local contracting with supply analysis.
- Validate value footprint levers, sustainability strategy leverage and comprehensive benefits.
- Monitor compliance of the goals in the strategies approved by this committee.

SUPPLIER VERIFICATION

The Supply Chain Management counts with a supplier verification process, through which, Ecopetrol verifies, enables and maintain a plural, updated and qualified Suppliers' Portfolio for the provision of the goods and services required for the Company's operation.

This process verifies the suppliers' compliance of the 5 criteria defined by Ecopetrol: i) Legal aspects, ii) Technical requirements, iii) Financial statements, iv) HSE obligations and v) Ethical and compliance component. These requirements are typified according to the goods or services offered, the type of supplier or the process of qualification applicable.

Supplier ESG Program



It is important to highlight that all natural or legal persons who wish to establish a contractual relationship with Ecopetrol **must be registered and qualified** in the Supplier Information System through the compliance of all the requirements established by the Company.

As mentioned, through this process, Ecopetrol verifies the compliance of the 5 criteria which looks to assure the following aspects:

- **Legal:** Verify the legal existence of the supplier and compliance with the minimum applicable legislation, depending on the type of person (Natural, Legal, Consortium or Temporary Union).
- **Technical:** Verify the compliance of the minimum requirements related to the commercial experience which are established according to the type of good or service offered and its level of risk and impact with Ecopetrol.
- **Financial:** Have the supplier's financial information available to validate its financial capacity to execute potential contracts with Ecopetrol.
- **HSE:** Verify the supplier's compliance with Colombian legislation in aspects related to HSE management.
- **Ethics and compliance:** This criterion is intended to ensure the ethical and compliance profile of the supplier to mitigate risks associated with this critical issue. All suppliers must complete the integrated ethics and compliance questionnaire providing critical details of its management such as the information of counterparties related to the supplier, alarms associated with issues of corruption, bribery, fraud, money laundering, terrorist financing, conflict minerals, among others.

Conforming to the results obtained during the verification process, the supplier is classified in accordance with its level of compliance with the requirements. This classification is made in the Supplier Information System, counting with the following qualification states:

- **Initial:** It is granted when the supplier complies with the following criteria: legal, technical, financial and HSE and the basic due diligence by verifying restrictive and control lists; this qualification enables suppliers to participate in Selection Methods but NOT to be contracted by Ecopetrol.
- **Comprehensive:** It is granted when the supplier complies with all the criteria requested in the verification process, including the verification in restrictive and control lists of all counterparties related; this qualification enables suppliers to participate in Selection Methods and be contracted by Ecopetrol.
- **Conditional:** It is granted when, during the verifying process, gaps are identified in one or more criteria, but the supplier qualification is endorsed by an Ecopetrol government area with sufficient supports to continue with the process. This qualification enables suppliers to participate in Selection Methods and be contracted by Ecopetrol.
- **Rejected:** It is granted when the supplier does not fully comply with all the required criteria. With this qualification, suppliers cannot be invited to participate in selection methods or to be contracted by Ecopetrol.

Supplier ESG Program



Accordingly, if the supplier cannot comply with the Legal, Technical, Financial, HSE and Ethics and compliance requirements established by Ecopetrol, the **supplier cannot be invited to participate in selection methods or be contracted** by Ecopetrol.

For suppliers who do not meet the requirements for their qualification in Ecopetrol's information system, four follow-up attempts will be conducted (via telephone and email) to request the completion of the pending documentation. If, after these four contact attempts, the corresponding information is not provided, the supplier will be assigned the qualification "Rejected due to lack of commercial interest," with this qualification the supplier cannot participate in selection processes or be contracted.

Furthermore, as part of the ongoing maintenance of Ecopetrol's supplier information system, suppliers who have not demonstrated any activity within the platform for a period of five years will have their profiles deactivated. If these suppliers wish to be reconsidered for participation in selection processes or for contract awards, they must undergo the registration and qualification process anew, complying with all requirements established by Ecopetrol.

Finally, as a comprehensive assurance measure, Ecopetrol also checks its current and potential suppliers in restrictive and control lists to validate the risk profile of the supplier and its counterparties related; In case of a finding in any supplier in any of these lists, it must be managed in accordance with the provisions of current regulations.

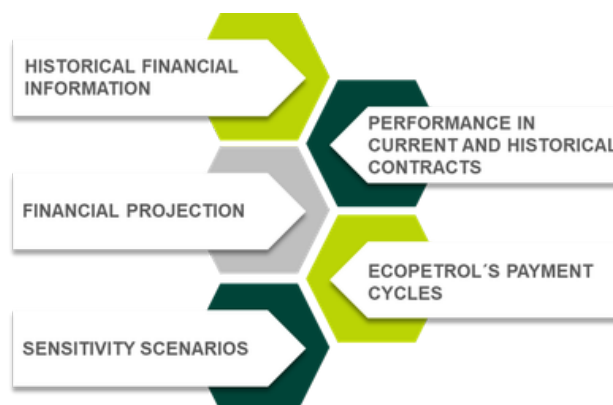
SUPPLIER FINANCIAL CAPACITY ANALYSIS

Evaluates the financial capacity and risk of potential suppliers to prevent possible breaches of their contractual obligations, through a comprehensive historical analysis of the suppliers' financial information (3 years).

This analysis provides a supplier financial profile, which contemplates the ability to finance working capital requirements, with internal sources derived from the contracts in progress and/or potential new contracts, as well as its financial profitability, debt and liquidity.

The companies that are identified as "Very High" and "High" risk, must be managed through the identification, design and implementation of controls and mitigants so that suppliers remain at residual risk levels that do not compromise the agreed contractual obligations.

The assessment is made up of the following aspects:



Supplier ESG Program



ANALYSIS OF SUPPLIER PERFORMANCE ASSESSMENT RESULTS

As part of the due diligence that Ecopetrol carries out to identify the potential suppliers to be invited to participate in the selection methods, as well as for contract signing, the supply chain official must carry out a comprehensive analysis of the supplier's favorable and unfavorable information, the results of the performance assessment trends, service lines, among other aspects considered as relevant information for the respective analysis.

The information considered as unfavorable is when the supplier has an assessment performance score less than 80 points in the criteria of Operational Efficiency, Contract Terms, Labor and Commercial Aspects and Environment Management and less than 85 points in the HSE Aspects criteria.

As part of the supplier improvement plan, when a supplier displays unfavorable information and if it is considered necessary, a Corrective Action Plan must be developed in accordance with the process defined by the Company. If one of the potential suppliers has a Corrective Action Plan in force, the supply chain official must request the contract monitoring official the advance, execution, or closure results of the plan, to carry out the respective analysis for decision making about the supplier participation into the selection method.

ANALYSIS OF OFFERS

During the selection methods, Ecopetrol carries out the analysis of offers presented by the suppliers, in accordance with the type of good or service required, market conditions, legal requirements and the defined criteria, which must consider the technical, economic, financial, logistical, legal, social, environmental and compliance aspects to evaluate and identify the offer that represents the best business for Ecopetrol.



Ecopetrol also counts with internal policies, guidelines and normative which seeks to strengthen the supplier's commitment with this crucial thematic:



DOCUMENT	SUMMARY	PUBLIC LINK
Contracting Manual	The Contracting Manual is the regulatory framework that guides the activities and legal transactions conducted by Ecopetrol S.A. for the supply of goods and services. The process of supplying goods and services regulated by this Manual includes the following activities: (i) supply planning; (ii) supplier management; (iii) provisioning; (iv) contract management; and (v) logistics and inventory management.	LEARN MORE
Contractor Performance Procedure	The supplier performance assessment contemplates the comprehensive management of sustainability in the execution of contracts; therefore, it has evaluation criteria for Environmental, Social and Governance (ESG) management. The contractor performance procedure establishes the methodology and criteria to assess the suppliers' performance to ensure the contracting objective are complied.	LEARN MORE

Supplier ESG Program



ESG CRITERIA INTO SUPPLIER SELECTION

During the Supplier's registration, selection and assessment performance processes, Ecopetrol considers the following ESG factors:

- 1 MANAGEMENT SYSTEMS, HSE AND TECHNICAL CERTIFICATIONS:**  
Suppliers must be registered at Ecopetrol's Supplier System Information, meeting different requirements such as: management systems certifications, HSE and technical certifications, among others according to their procurement category (economic activity).
Weight: 100%
- 2 PROMOTION OF THE NATIONAL INDUSTRY:**  
National Government Legislation (Law 816 of 2003) aims to support the national industry through public procurement. During the selection process this is a mandatory evaluation factor.
Weight: about 10% - 20% (if applicable)
- 3 HSE (HEALTH, SAFETY Y ENVIRONMENT) CRITERIA**  
Evaluates if the supplier has the ISO-14001/2004 certification, or a HSE plan for the management of health and safety risks at work and environment protection; training programs; emergency response capacity or effectuate an analysis supplier real performance (positive or negative) in terms of disabling or fatal events.
Average weight: determined according to the procurement strategy.
- 4 LOCAL OFFER - GOODS AND SERVICES:**  
Ecopetrol has in place a "Local contracting of goods and services for the supply chain policy" that promotes local contracting in the procurement strategies. This factor is optional and in accordance with each procurement strategy.
Average weight: determined according to the procurement strategy.
- 5 ACTIVITIES FOR VALUE GENERATION**  
Promotes the deployment of activities to strengthen regional prosperity and well-being of municipalities of operation through business strengthening, innovation and development programs, and transfer of knowledge or technology.
Average weight: determined according to the procurement strategy.
- 6 PROMOTION OF PUBLIC FOOD PROCUREMENT POLICY**  
Compliance with National Law 2046 of 2020, which seeks to promote the participation of small local and agricultural producers whose production systems belong to peasant, familial and community agriculture, or their legally constituted organizations.
Weight: minimum 10% (if applicable)

Supplier ESG Program



7 LOCAL EMPLOYMENT PRIORITIZATION

Commitment to prioritize the employment of skilled and unskilled local labor. The supplier must present at least a commitment to contract 100% of the local unskilled labor and more than 30% of skilled local labor.

Average weight: determined according to the procurement strategy.

8 DIVERSITY AND INCLUSION - WORKFORCE:

Promotes local hiring of people classified into one or more of the following groups: women, people with disabilities, first job, ethnic groups and victims of armed conflict. This factor is optional and in accordance with each procurement strategy.

Average weight: determined according to the procurement strategy

9 ENVIRONMENTAL CRITERIA:

1. Decarbonization: Reduction of Greenhouse Gas emissions (carbon intensity indicator or tons of CO₂e reduced)

2. Zero water discharges: Water footprint calculation generated for the selection process or during the execution of the contract.

3. Natural Capital (Biodiversity): Actions that enhance the Net Zero Deforestation Goal through the commitment to the “Intersectoral Pact for Legal Timber in Colombia; count with the Colombian Environmental Seal (SAC) or National Certification Initiative Forest Stewardship Council (FSC), also known as the Voluntary Forest Certification Working Group (CFV).

4. Materials and waste: Percentage of recycled raw materials and/or reused and/or remanufactured products used in the manufacture of the good or in the provision of the service or alternatives for the resale of materials or buy back, indicating the value and/or the resale fee.

Average weight: determined according to the procurement strategy.

10 PERFORMANCE ASSESSMENT:

Ecopetrol assesses the comprehensive ESG management of its suppliers, through 5 criteria distributed as follows:

* Environmental: HSE aspects

* Social: Labor and Commercial Aspect, and Milieu Management

* Governance: Operational Efficiency, and Contract Terms

Average weight: each factor has an individual weight of 100%

Supplier ESG Program



WORLD-CLASS TALENT

INTERNAL TRAINING PROGRAM FOR SUPPLY OFFICIALS

Supply Management recognizes the training, reskilling and installation of new capacities and abilities of the human talent to reach and maintain the competence level to face the challenges imposed by new ESG® trends, climate change and energy transition for which it has designed a training system for officials.

In 2024, the internal training program integrated:



STRATEGIC SUPPLY CHAIN PROGRAM

Count with qualified human talent for processes' transformation, through training in the necessary capacities, skills and knowledge of supply chain and its sustainable management, ensuring that supply chain officials have the fundamental skills in relevant aspects such as strategic thinking, leadership, financial evaluation, risk management and decision making, among others. This Program is developed in alliance with Los Andes University.



TRAINING PROGRAM FOR SUPPLY CHAIN OFFICIALS

The Supply Chain Officials Training Program was developed with the objective of strengthening their ability to plan and carry out contracting processes, generating value for the organization, reinforcing theoretical and practical knowledge necessary in the development of selection methods, negotiations, and analysis of offers, in a strategic and ethical manner. The Program has 6 thematic axes, among them, the ESG management of the Supply Chain, to reinforce the concepts associated with sustainability and its importance, raise awareness about the impact their function has, as well as explain and promote the sustainable management and the mechanisms that the process has, finalizing with the generation of a personal commitment, made by each official, in ESG matters within their daily functions. In 2024, 101 supply chain official successfully completed this training.

CONTRACT MONITORING OFFICIALS ' ACADEMY

Contract monitoring officers are key interlocutors for the correct performance of the agreed contractual obligations; therefore, the supply chain process recognizes the importance of updating and strengthening their knowledge by designing training programs on high relevance topics for its function, during 2024, 21 workshops and forums were held with the attendance of 200 people average per session, covering critical topics such as payment management, information leak, third parties risk mitigation, SECOP, petition rights, blockage management, claims, particular economic activities, decarbonization, cybersecurity (archer the new technological tool in contractual cybersecurity diagnostics), disclosure of the practice work control, Opex estimates, performance assessment in SAP ARIBA (process and tool), prioritization of skilled local labor, Fieldglass digital platform, management and prevention of conflicts of interest and ethical conflicts and tax management.



SUPPLIER SCREENING

Orgullosamente
ECOPETROL

Supplier Screening



The supplier screening process evaluates two major variables of analyses: i) Performance Assessment and ii) Strategic Potential, this analysis is complemented with the Management Concept of the Supply Chain and Business leaders to calibrate and validate the data according to Company's current and future strategies.

The information considered for supplier screening is detailed below:

PERFORMANCE ASSESSMENT

The supplier performance assessment contemplates the comprehensive management of sustainability in the execution of contracts; Therefore, it has evaluation criteria for Environmental, Social and Governance (ESG) management, through 5 indicators distributed as follows:



Environmental: HSE aspect






Social: Labor and Commercial Aspect, and Milieu Management



Governance: Operational Efficiency, and Contract Terms

According to the comprehensive performance assessment result, the supplier will be classified into one of the 3 levels:

-  **1. Exceptional Performance: >98 points**
-  **2. Satisfactory Performance: (> or = 85 points)**
-  **3. Low Performance: (< 85 points)**



STRATEGIC POTENTIAL

Measures the potential impact on value generation that the supplier can represent to Ecopetrol, analyzing the following indicators:



BUSINESS RELEVANCE:

1. Participation of the supplier in the contracted categories, allows identifying the degree of substitutability.
2. Growth potential allows identifying the supplier's financial capabilities that could improve Ecopetrol's value proposition.
3. Market context looks to find:
 - Supplier's share of spend
 - Importance of Ecopetrol in the supplier's income
 - Impact and risk level of the contracted good or service



SOCIAL

1. Local Impact Indicator allows the analysis of the suppliers that leverage social development in the territories through local employment or local goods and services contracting.

Supplier Screening



MANAGEMENT CONCEPT



GOVERNANCE:

A calibration and validation exercise with Supply Chain and Businesses Leaders (if applicable) of the screening process result, its alignment with the corporate strategy, the review and analysis of sensitive issues such as ethical alarms.

ENVIRONMENTAL SUPPLIER SCREENING

The Supplier Environmental Screening identifies strategic suppliers that leverage the goals of decarbonization that allows identifying strategic suppliers in environmental matters and prioritize the efforts that must be made in each of the defined environmental postulates.

The variables for classification are described below:



DECARBONIZATION: Supplier classification according to the amount of tCO₂e generated:

- **HIGH:** POTENTIAL GHG EMISSIONS GENERATION IN A YEAR GREATER THAN 500tCO₂e
- **MEDIUM:** POTENTIAL GHG EMISSIONS GENERATION IN A YEAR BETWEEN 100tCO₂e AND 500tCO₂e
- **LOW:** LESS POTENTIAL GHG EMISSIONS GENERATION IN A YEAR THAN 100tCO₂e



MATERIALS AND WASTE

Spend of goods or services where waste is generated or that leverage circularity and waste treatment strategies.



WATER NEUTRALITY

Spend of goods or services where there is intensive use of materials that affect Ecopetrol's water footprint, or a waste treatment is carried out.



NATURAL CAPITAL (BIODIVERSITY)

Spend of goods or services that have an impact on the 0 Net Deforestation strategy, due to the use of wood

RISK SCREENING METHODOLOGIES

SECTOR 'S RISK AND OPPORTUNITY ANALYSIS

The Supply Chain Process designed the Market Indicators Surveillance System, through which 50 national and international indexes are monthly analyzed to measure and monitor inflation and key variables that directly or indirectly impact the goods and services rates required by Ecopetrol and its Business Group.

Additionally, global risks are monitored in Economic and Geopolitical, Environmental, Social and Technological aspects, covering each of the dimensions defined for sustainable (ESG) Supply Chain Management.

Supplier Screening



RISK 'S IDENTIFICATION AND MONITORING OF COMMODITIES, GOODS AND SERVICES REQUIRED

Committed to supporting the energy transition, the Supply Chain Process, through the monitoring of 10 key indicators, developed a historical price evolution monitoring board for the different goods and services required for the operation and, also, for the essential needs of the Energy Transition Strategy.

RISK FACTORS ASSOCIATED WITH ECOPETROL'S FRAUD, CORRUPTION, MONEY LAUNDERING AND TERRORIST FINANCING

Ecopetrol's Ethics and Compliance area carries out the Segmentation of sources and risk factors associated with Ecopetrol's Fraud, Corruption, Money Laundering and Terrorist Financing, which allows the implementation of control measures, with a risk-based approach.

The controls and treatment plans are aimed at preventing ML/TF/FPADM risks in a differentiated manner for third parties based on their risk rating.

The risk criteria analysis seeks to obtain a complete view that contributes to informed decision-making regarding commercial relationships established with third parties.

The factors analyzed are:



CONSULTATION OF RESTRICTIVE AND CONTROL LISTS:

Includes consultation of legal representatives, members of the Board of Directors and shareholders.






ANALYSIS OF POLITICALLY EXPOSED PERSONS (PEPS)

Identify all possible relationships with National and Foreign PEPs and the PEPs of international Organizations.



TERRITORIAL JURISDICTION:

Risk rating of the geographic areas of the supplier origin, this factor 's risk management is characterized by the level of risk assigned:

-  **Restricted:** The supplier will be immediately blocked at Ecopetrol' s Supplier System Information.
-  **Medium or High:** the supplier is asked for its policies, programs or ethical guidelines and internal control system, this evidence is analyzed by the Compliance Area and the Supply Chain Process executes the actions defined for the supplier ' s treatment.
-  **Low:** The supplier does not present a risk for the operation.

The territorial jurisdiction information is updated every 2 months by the Ethics and Compliance Area and is considered for the supplier verification process. If a supplier is identified with a Medium or High risk, the supplier is asked for its policies, programs or ethical guidelines and internal control system, this evidence is analyzed by the Compliance area and the Supply Chain Process executes the actions defined for the supplier ' s treatment, instead, if the supplier ' s origin country is a Restricted Jurisdiction the company will be immediately blocked at Ecopetrol ' s Supplier System Information.

Supplier Screening



NON-TIER 1 SUPPLIER SCREENING

The supply chain process allows a comprehensive segmentation in accordance with strategy, category of goods or services and the type of supplier. This means that in the identification of the procurement needs, the process takes into account those factors and determines the critical activities that must be directly contracted and performed by its tier 1 suppliers and the non-critical activities that could be subcontracted or provided by third parties (non-tier 1 suppliers).

Ecopetrol classifies its non-tier 1 suppliers, as follows:



SUBCONTRACTOR

Natural or legal entity who carries out activities on behalf of Ecopetrol's suppliers that are an essential part of the object and scope of the contract executed for Ecopetrol. All the subcontracts must be authorized and approved by Ecopetrol.



PROVIDER

Natural or legal entity that performs activities on behalf of Ecopetrol's suppliers that are not an essential part of the scope and object of the contract executed for Ecopetrol.

In 2025, Ecopetrol strengthened its supplier screening process for non-tier 1 suppliers, identifying subcontractors as significant non-tier 1 suppliers given that they perform activities inherent to the contract. Ecopetrol then selected those subcontractors representing the Pareto-relevant portion of subcontracted spend, resulting in a set of significant non-tier 1 suppliers that may have a high impact on the company's operations and that account for the largest share of expenditures within this group. Under this new methodology, for 2025, Ecopetrol identified **14** significant non-tier 1 suppliers.

ECOPETROL'S SUPPLIER SCREENING RESULTS

In 2025, the Company identified a total of **132 significant suppliers** (**118** tier 1 + **14** non-tier 1).

This classification allowed Ecopetrol to focus its differentiated relationship mechanisms and extend its capacity development programs to its significant non-tier 1 suppliers to contribute to the strengthening of the different actors of its chain.



SUPPLIER ASSESSMENT AND DEVELOPMENT

Orgullosamente
ECOPETROL

Supplier Assessment



SUPPLIER DESK ASSESSMENT

SUPPLIER PERFORMANCE ASSESSMENT

The supplier performance assessment contemplates the comprehensive management of sustainability (ESG) in the execution of contracts; therefore, it seeks to measure the compliance with the Environmental, Social and Governance management commitments, acquired by the supplier for the contract execution Ecopetrol.

This assessment is based on 5 indicators distributed in each ESG dimension:



ENVIRONMENTAL MANAGEMENT:

Measure the compliance of the “HSE Aspect” criterion to monitor and reduce the potential negative impact on people, the environment, and facilities during the execution of contracts.



SOCIAL MANAGEMENT:

Measure the compliance of:



Labor and Commercial Aspects Criterion: Monitor and measure compliance with legal and contractual obligations of a commercial, labor, or social security nature. It also contemplates the inclusive labor employment or local employment.



Milieu Management criterion: Monitor and measure incidents, complaints and claims that affect the milieu and that are attributable to the supplier. Likewise, it measures the level of compliance with the commitment acquired by the supplier for the local contracting of goods and services and the activities for value generation.



GOVERNANCE MANAGEMENT:

Measure the compliance of:



Operational efficiency criterion: Monitor and measure the efficiency of the contracted service and compliance with the value promise in economic, technical, object and scope of the contract and/or supply strategy.



Contract terms: Evaluate compliance with the agreed work plan and the monitoring and control of the delivery of administrative documents, which contemplates the supplier qualification in the Supplier Information System, complying with the legal, financial, commercial, HSE and ethics and compliance requirements.

Supplier Assessment



SECOND PARTY ASSESSMENT AND VERIFICATION MECHANISMS

To guarantee the correct execution of the contractual relations, Ecopetrol has generated an Integral Ecosystem of Risk Management Measures and Contracts Execution Verification Mechanisms:



Commercial assurance: Includes:

- **INTERNAL EARLY WARNING SYSTEM:** Monitors suppliers' compliance regarding claims and complaints, incidents reported in site, contract's economic deviations, late payments, garnishments, and insolvency. This system also supervises the non-compliance impact in Ecopetrol's operations (measured by concentration of contracts with Ecopetrol, estimated value of non-compliance obligations and number of workers - exclusive labor force).
- **INTERNAL RISK MANAGEMENT SYSTEM:** Designed by AON and used by Ecopetrol to identify and control risks associated with third parties sourcing, including policy coverage design, negotiation with the insurance market, issuance, and monitoring of policies, among others.
- **PRECITICAL AND CRITICAL CONTRACTS ANALYSIS:** Monitors the historic suppliers' non-compliance with payment obligations with its third parties.



Claim and Complaints management: Ensure the implementation, by Ecopetrol's suppliers, of strong, efficient and timely management systems for petitions, complaints and claims and its respective disclosure to stakeholders

SECOP: Report and disclosure of the contracts managed by Ecopetrol in the National Electronic System of Public Contracting.

Supplier Assessment



THIRD PARTY ASSESSMENT AND VERIFICATION MECHANISMS

COMMERCIAL VERIFICATIONS

The Commercial Verification Model for Goods and Services in Critical Contracts at Ecopetrol is a mechanism designed to assess compliance with legal, commercial, and contractual aspects by contractors operating in critical territories. This model enables the generation of alerts and recommendations for both contractors and contract management professionals, ensuring regulatory compliance and minimizing operational and environmental risks.

OBJECTIVE:

- Verify legal and contractual compliance in the procurement of local goods and services.
- Make alerts and recommendations to suppliers and contract management professionals for proper handling.
- Serve as an impartial tool for evaluating supplier performance.

VERIFICATION TOOL:

The model is based on a structured tool with standardized criteria that allows evaluating regulatory and contractual compliance in the regions where Ecopetrol operates.

The verification tool is structured as follows:

1. General contract information
2. Characterization of goods and services
3. Verification process for goods and services, covering various topics:
4. Clauses on obligations for goods and services.
5. Activities for value generation.
6. Compliance with the Public Food Procurement Law (Law 2026 of 2020).
7. Compliance with legal requirements in contracted services (transport, food, waste, among others).
8. Compliance with commercial agreements.
9. Management of supply chain integration.

Each of these topics is supported by national regulations and Ecopetrol's internal policies to ensure compliance with the established requirements.

Supplier Assessment



IMPACT ASSESSMENT AND CORRECTIVE ACTIONS:

Findings detected during verification are classified according to their impact on contract execution, allowing the definition of necessary corrective actions:

Risk	Criteria	Actions to be Taken
Compliant	Meets the verified regulations	Not applicable
Low	Does not implement best practices but does not affect execution	General recommendations to the Contract Management Professional
Medium	Environmental impact, potential non-compliance	Notification to the Contract Management Professional and possible contractor warning
High	Legal or contractual non-compliance, operational impact	Formal notification, immediate corrective actions, potential impact on performance evaluation

The Commercial Verification Model for Goods and Services in Critical Contracts at Ecopetrol is a fundamental tool for ensuring transparency, regulatory compliance, and efficiency in procurement. Its application allows identifying risks, preventing non-compliance, and strengthening contractual relationships with suppliers and contractors, thus ensuring the sustainability of the company's operations in the regions of operation.

VERIFICATION EXECUTER:

Commercial verifications are carried out by third parties hired by Ecopetrol to evaluate compliance with contractual obligations. Currently, there are 2 companies to carry out the verifications which are certified in business management systems such as: ISO 9001, ISO 14001, ISO 45001 and ISO 50001.

Supplier Assessment



LABOR VERIFICATIONS

As part of its corporate social responsibility policy, Ecopetrol S.A. ensures compliance with labor and social security obligations, both legal and extralegal, by contractors, subcontractors, and suppliers involved in contract execution. Labor verifications are carried out through formal and documentary reviews at contracting companies.

These verifications are conducted by a third party hired by Ecopetrol, responsible for ensuring the proper execution of the process, requesting and analyzing the necessary information, and ensuring a complete and timely resolution of any findings.

OBJECTIVE

- Verify legal and contractual compliance with labor and social security obligations.
- Ensure that suppliers uphold workers' rights in accordance with Colombian labor law and international standards.
- Identify risks related to non-compliance and propose corrective actions.

VERIFICATION TOOL

Labor verifications are conducted using a structured format developed by Ecopetrol, based on international labor standards and best practices, as well as Colombian regulations and company's labor guidelines. Some of the main topics verified are described below:

- General labor compliance assessment
- Verification of workers' wages and benefits
- Compliance with legal and extralegal labor obligations
- Social security contributions validation
- Adherence to human rights principles and diversity policies

The verification process adheres to key national and international regulations and standards, including:

1. Decrees 284 of 1957 and 3164 of 2003, which mandate equal pay and benefits for contractor employees performing essential petroleum industry tasks.
2. The Substantive Labor Code and related labor regulations.
3. Law 100 of 1993, which establishes the Integral Social Security System.
4. Decree 1668 of 2016, which prioritizes local labor recruitment.
5. Law 1636 of 2013, requiring employers to register job vacancies with the Public Employment Service.

Supplier Assessment



Additionally, Ecopetrol aligns its labor verification process with international human rights and labor protection guidelines, including:

- UN Guiding Principles on Business and Human Rights
- The Ten Principles of the UN Global Compact
- OECD Guidelines for Multinational Enterprises
- ILO Tripartite Declaration of Principles
- ILO Conventions on Freedom of Association (C087)
- In its commitment to diversity, equity, and inclusion, Ecopetrol adheres to:
- UN Women's Empowerment Principles
- UN LGBTIQ+ Business Conduct Standards
- ILO Guidelines on Ethnic Diversity in the Workplace
- Guidelines on the Rights of Persons with Disabilities

IMPACT ASSESSMENT AND CORRECTIVE ACTIONS:

Findings detected during verification are classified according to their impact on contract execution, allowing the definition of necessary corrective actions focused in each topic impacted.

The Labor Verification Model at Ecopetrol ensures compliance with labor laws and best practices, reinforcing the company's commitment to human rights and social responsibility. By identifying and mitigating risks associated with labor relations, the model enhances transparency and promotes fair labor conditions for all workers involved in Ecopetrol's contracted activities.

VERIFICATION EXECUTER:

Labor verifications are carried out by a third party hired by Ecopetrol to evaluate compliance with contractual obligations. Currently, 1 company is in charge to carry out the verifications and is certified in business management systems such as: ISO 9001, ISO 14001, ISO 45001 and ISO 50001.

Supplier Assessment



COMPLIANCE WITH NATIONAL AND INTERNATIONAL STANDARDS AND SUPPLY CHAIN MANAGEMENT BEST PRACTICES

Ecopetrol carries out labor and commercial verifications of its suppliers, to promote and guarantee its compliance based on international standards such as: UN Guiding Principles on Business and Human Rights, the 10 Principles Global Compact, the OECD Guidelines, the Voluntary Principles on Security and Human Rights, ILO Tripartite Declaration, UN Principles for the Empowerment of Women, Principles of Conduct for the Protection of LGBTBIQ+ People, the Guide for Companies on the Rights of People with Disabilities, and Diversity Guide ILO, among others. Additionally, the commercial and labor verifications also contemplate the compliance of the national obligations and the Ecopetrol's internal guidelines.

To strengthen responsible supply chain management, supplier verifications are conducted based on internal regulations, national and international legislation, as well as alignment with industry standards and best practices such as SMETA, which integrates principles of business ethics, human rights, labor compliance, and environmental performance, reinforced through articulation with the RBA, whose Code of Conduct serves as a global benchmark for promoting safe and responsible working conditions, and with the AMFORI BSCI criteria, which focus on decent work, non-discrimination, freedom of association, and robust management systems. The integration of these multiple standards and regulation fosters a culture of compliance, transparency, and continuous improvement that enhances suppliers' ESG performance and contributes to more ethical, resilient, and sustainable supply chains.

Ecopetrol's Supply Chain is a national and international benchmark due to its remarkable management, therefore, it continually challenges its performance to incorporate the best market practices and accomplish national and international standards, both in its operation and in its suppliers' performance. The decisions and strategies made for the Process Evolution have taken into account the recommendations and assessments carried out by international consultants, such as Boston Consulting Group, Kearney and Mckinsey, which have allowed the identification of the Process' maturity level, including suppliers' management.

According to these assessments, Ecopetrol have been recognized with a high level of performance, being classified within the top quartile of the industry in the "Aspirant" category in the Kearney Assessment of Excellence in Procurement (AEP) measurement and the consultancy for strengthening of suppliers screening carried out by Boston Consulting Group, which have been successfully implemented.

In 2025, the supplier screening and assessment methodologies and its results were audited by Deloitte with a positive result regarding the practices implemented by Ecopetrol.

Supplier Assessment



“ON-SITE” OR DESK VERIFICATIONS

Assessments on demand, carried out in a corrective or preventive manner to the process and the regulations of suppliers' performance, in order to verify the compliance with the guidelines and methodologies established for this purpose, said assessment must comply with the parameters of: objective, scope, definition of population and sample, verification instrument, report of results and corrective action plans to close gaps or improvement opportunities identified (if applicable). However, Ecopetrol may carry out audits, inspections, reviews, or other types of visits to measure and verify the compliance with guidelines and methodologies of the performance process of suppliers.

Additionally, the company counts with OEA audits that must be carried out as part of the mandatory verification process required by national authorities to certify security, customs compliance, and reliability within the international supply chain. These audits assess the management of risks related to transparency, ethics, integrity, anti-money laundering, cargo handling, physical security of containers, personnel security, and the security practices of business partners. Ecopetrol has been conducting these audits for its logistics contractors virtually through the international firm Bureau Veritas; however, beginning in 2026, they will be performed onsite through a third party certified for this purpose.

SUPPLIER CORRECTIVE ACTION PLAN

In accordance with the results of Supplier's Performance Assessments, Ecopetrol and the supplier may agree to generate an improvement plan that allows managing and closing the gaps identified during the contract execution. The development of the improvement plan must consider the level of deviation in the qualification of the evaluated criteria and the contract execution term. For its application the suppliers must prepare a proposal of the foreseen improvement plan, and it must be approved by Ecopetrol before beginning its implementation. Corrective action plans are only applied to significant suppliers identified through the supplier segmentation which is carried out by Ecopetrol on an annual basis.

With the approval of the improvement plan, the supplier agrees to fully adopt and comply with the agreed actions, and Ecopetrol's contract monitoring official must review and ensure the quality of the deliverables and the timely closure of the settled activities.

TRACKING AND MONITORING:



The Ecopetrol contract monitoring official must review and ensure the quality of the deliverables and the timely closure of the settled activities. If it is identified that the actions agreed have not been implemented, the improvement plan must be suspended and invalidated. The officer must inform this situation to the supply category leader, the auditor, the technical and functional area (labor, environmental, commercial, HSE, among others) for the respective analysis and decision-making.



The Supplier Performance Leader will monitor the coverage and effectiveness of the corrective action plans implemented to significant suppliers guarantee their assessment and development.

Supplier Assessment



COVERAGE:



In 2025, **13** significant suppliers required the development and implementation of improvement plans due to the results of their performance assessments. Therefore, Ecopetrol, in mutual agreement with these suppliers, approved the generation of the respective plans, covering **100%** of the suppliers which required corrective action plans to close the identified gaps.

CORRECTIVE ACTION PLAN IMPLEMENTATION SUPPORT:



The contract monitoring official is the responsible for the follow up and monitoring of the execution of the actions defined in the plan, ensuring the implementation with quality and timeliness of the deliverables, with the support of the functional leaders, as applicable.



Consult the internal normative about this aspect

DOCUMENT	SUMMARY	PUBLIC LINK
Contractor Performance Procedure	The supplier performance assessment contemplates the comprehensive management of sustainability in the execution of contracts; therefore, it has evaluation criteria for Environmental, Social and Governance (ESG) management. The contractor performance procedure establishes the methodology and criteria to assess the suppliers' performance to ensure the contracting objective are complied.	LEARN MORE
Draft and Development of Improvement Plans	Definitions against the construction and development of corrective action plans (contractor performance procedure)	LEARN MORE

Supplier Assessment



SUPPLIER INFORMATION AND TRAININGS

Ecopetrol counts with different programs for suppliers' capacity building, during 2025, **112** significant suppliers (tier 1 and non-tier 1) participated in one or more of the development actions, achieving a coverage of **85%** of significant suppliers.



PERFORMANCE REVIEW MEETING

The Performance Review Meetings (PRM) is a relationship mechanism based on high-level meetings between Ecopetrol and its suppliers to enhance the value generation during the commercial relation through collaborative schemes. These sessions are implemented with the significant suppliers identified through the segmentation and aimed to capture mixed efficiencies activities along the contract performance.

The PRM counts with a broadly review about performance, results obtained, improvement opportunities and potential joints for value generation initiatives, among other critical success factors. This analysis is based on a strategic vision of the significant suppliers, and not on the execution of a specific contract, accordingly, in these meetings, issues associated to tariffs negotiation, administrative and transactional aspects or portfolios of supplier's goods and services are not reviewed.

Through the deployment of these sessions, Ecopetrol seeks:



- **Achieve an incremental value in operations**, through strategic relationships with suppliers during contracts execution.
- **Build strategic relationships** and synergies generation that contribute to a sustainable value chain.
- **Identify opportunities for innovation and new technologies** to improve operational efficiency and achieve environmental sustainability goals, implementing the best market practices.
- **Develop projects and/or initiatives to generate value** that improve results, market competitiveness and resilience in the value chain.
- **Strategically manage environmental, social, technical and process aspects** in the execution of contracts and the respective definition of improvement actions.

STRENGTHENING OF SUPPLIER COMPLIANCE AND ETHICAL CONDUCT AND POLICIES

The conduct of suppliers and their workers with whom Ecopetrol has a commercial relationship must be characterized by transparency, clear rules, and consistency; with a total rejection and zero tolerance of any conduct that goes against the postulates defined and adopted in the Code of Ethics and Conduct of the Ecopetrol Group.

Supplier Assessment



Therefore, training spaces have been developed to strengthen the knowledge and appropriation by suppliers of these standards, such as:



IMPROVEMENT OF BUSINESS SKILLS, DIVERSITY AND INCLUSION POLICIES AND NEW TECHNOLOGIES ADOPTION

Ecopetrol has generated a portfolio of activities focused on ensuring suppliers' development in critical topics such as Corporate and Supply Strategy, business capacities improvement, diversity and inclusion policies promotion and new market technological enablers integration, among others. The assurance of knowledge and management capacity of these aspects and the corresponding gaps identification and main levers for improvement are crucial objectives of each program deployed.

These actions have a great impact on suppliers' development, since they are focused on the main needs found:



BUSINESS STRENGTHENING WORKSHOPS

Strengthen the business capabilities of suppliers, joint co-creation and contribute to closing identified corporate gaps identified.



HUMAN RIGHTS WORKSHOPS

Increase suppliers' commitment with the promotion, compliance and respect for the human rights in their operations.



DIVERSITY AND INCLUSION POLICIES

Promote the inclusion of diversity and inclusion policies by suppliers.



DIFFUSION WORKSHOPS

Disseminate information of interest to suppliers on ethical, HSE, corporate issues and the modifications described in the Contracting Manual, among others

Supplier Assessment



SUPPLIER'S BUSINESS SCHOOLS

Due to Ecopetrol's role in the national economy, the company identified the municipalities where its impact have a major impact, analysis based on its importance in the regional development, evaluating its participation in job creation, taxes, royalties, aspects that promote and generate dependence on the oil & gas industry.

Under this scenario, the company seeks to diversify the regions by supporting the incursion into new businesses and the enhancement of regional productive matrix, supporting the suppliers' formalization, financial management reinforce, marketing and other critical business aspects improvement.

One of the initiatives deployed by Ecopetrol for the suppliers' development was the establishment of 2 business schools:



“EMPRENDE CON ENERGÍA” SCHOOL

Program focused on training entrepreneurs in administrative aspects, e-commerce, innovation, leadership, environmental sustainability, among others while their products are promoted.



“PROVEEDOR IN” SCHOOL

Its purpose is to promote knowledge, train and strengthen current suppliers in transversal aspects applicable to the business environment.

SUPPLY CHAIN SUSTAINABILITY MANAGEMENT BENCHMARK

Ecopetrol suppliers can consult the Supply Chain Sustainability Benchmark for free through Company's website, in this document the main objectives of the management of each ESG dimension are explained remarking some of the good practices implemented by Colombian companies, as well as the Benchmark of the disruptive business models that some suppliers have successfully implemented.



Ecopetrol makes this information for public access aiming that current or potential suppliers can analyze their management against the good practices identified.

DOCUMENT	SUMMARY	PUBLIC LINK
Supply Chain Sustainability Benchmark	Identify and analyze the sustainable (ESG) management of the supply chain of public and private companies, knowing trends and best practices that allow having a counselor to strengthen sustainability initiatives within the Supply Chain of Ecopetrol and its suppliers.	LEARN MORE
Disruptive business models Benchmark	It shows alternative business models, purchasing models for innovation, contractual models, among others.	LEARN MORE

Supplier Assessment



IN-DEPTH TECHNICAL SUPPORT PROGRAMS

HSE MANAGEMENT REINFORCEMENT

To promote the safe, healthy, and environmentally responsible performance of a supplier and ensure compliance with applicable HSE legislation and regulations, Ecopetrol implemented an Internal System to share and implement good HSE management practices by suppliers. For the development of this scheme, Ecopetrol prioritized 36 HSE practices on topics such as: Safety, clean, and healthy work promotion; Process safety; HSE management systems; Risk and hazard management; Incident Investigation, Waste Management, Work Control, Change Management, Operational Discipline and Process Technology, among others.

Once the good practice is shared by Ecopetrol, the supplier must complete the suggested actions within a maximum period of 1 month and the HSE area will oversee monitoring compliance with the proposed activities.

Additionally, to ensure the reliability of the HSE management model and results of suppliers' performance assessment, Ecopetrol developed the HSE findings report module for suppliers on Salesforce technological platform, which allows the record of the HSE findings identified during the contract performance with online information access to carry out an objective, coherent and timely measurement of the HSE performance criteria and support HSE management decision-making, by the different interlocutors of the supply chain management process.

ENVIRONMENTAL MANAGEMENT TRAINING

Committed to sustainable Environmental Management, the supply chain has a training program on relevant topics for the different actors in the process: Supply Chain Officials, Suppliers and Contract Monitoring Officials, based on the four topics of the environmental sustainability strategy for the supply chain: Decarbonization, Waste and Materials, Zero water discharges and Natural capital.

This training was based on the environmental sustainability segmentation, a methodology to analyze the whole universe of contracts, applying criteria like the potential of greenhouse gas -GHG- emissions generation in the operation of contracts, the possibility to incorporate circular economy business models, the impact on the Ecopetrol's indirect water footprint and the relation of each procurement category with Net Zero Deforestation commitment.

LABOR ASPECTS TRAINING

Recognizing the importance of correct labor management by Ecopetrol suppliers, training is developed to strengthen the knowledge of suppliers on this aspect to ensure correct compliance with labor obligations associated with the execution of contracts with Ecopetrol.



KPI SUPPLIER

ASSESSMENT AND DEVELOPMENT

Orgullosamente
ECOPETROL

Supplier Assessment



KPIs FOR SUPPLIER ASSESSMENT AND DEVELOPMENT

The results obtained for 2025 are detailed below:

DESCRIPTION	DATA 2025
1.1 Total number of unique suppliers	3.142
1.2. Number of unique significant suppliers	132
1.3 Number of unique significant suppliers supported with development measures	112
1.4 Number of unique significant suppliers assessed via desk assessments / on-site assessments	132
1.5. Numer of unique significant suppliers assessed with substantial actual / potential negative impacts	13
1.6. Number of unique significant suppliers assessed with substantial actual/potential negative impacts with agreed corrective action/improvement plan	13
1.7. Number of unique significant suppliers with substantial negative impacts that were terminated	0

 In 2025, the KPIs provided regarding Ecopetrol's supplier assessment and development results were audited by the international auditing firm Deloitte.

KPI for Supplier Assessment



and Development

AUDIT CARRIED OUT BY EY

CLICK TO CONSULT THE INFORM:

Pages: 393, 394, 395, 397, 401, 402



AS-2848-25
March 27, 2025

Free Translation

Independent Limited Assurance Report

To the Management of Ecopetrol S.A.

1. Scope

We have been engaged by Ecopetrol S.A. (hereinafter "the Company" or "Ecopetrol"), to perform a "limited assurance engagement," as defined by International Standards on Assurance Engagements, here after referred to as the engagement, to report on the identified sustainability information (the "Subject Matter") that is detailed in Annex 1 contained in the "Integrated Management Report 2024" of Ecopetrol S.A. for the period from January 1st to December 31st, 2024 (the "Report").

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

2. Criteria applied by Ecopetrol S.A.

In preparing the Subject Matter detailed in Annex 1, Ecopetrol S.A. applied the GRI Global Reporting Initiative Standards criteria in accordance with the "by reference" option self-declared by the Company; the SASB Sustainability Accounting Standards Board and custom criteria that are listed in Annex 2 (Criteria). The custom criteria were specifically designed to complement the Integrated Management Report 2024; as a result, information about the Subject Matter may not be suitable for another purpose.

3. Company Responsibilities by Ecopetrol S.A.

Ecopetrol's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records, and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

Ernst & Young Audit S.A.S.
Bogotá D.C.
Calle 11 No. 68 - 17
Edificio Páramo Oriente Office
Torre Plus
Tel: +57 (0)21 684 7000

Ernst & Young Audit S.A.S.
Bogotá - Avenida
Carrera 63A No. 3 sur 13B
Edificio Wila Office
Torre 1 - Plus 10
Tel: +57 (0)21 380 8400

Ernst & Young Audit S.A.S.
Cali - Calle San Carlos
Avenida 4 Norte No. 9B - 01
Edificio Siga 100
Oficina 202
Tel: +57 (0)2 282 387 8888

Ernst & Young Audit S.A.S.
Barranquilla - Avenida
Calle 77B No. 38 - 01
Edificio Centro Empresarial
San Antonio 8 Oficina 211
Tel: +57 (0)21 215 8888



To: Ecopetrol S.A.

Page 3
March 27, 2025

Free Translation

Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance. Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance limited engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject matter detailed in Annex 1 and related information and applying analytical and other appropriate procedures.

Our procedures included:

- Conduct interviews with Company personnel to understand the business and the Report preparation process.
 - Conduct interviews with those responsible for the Report to understand the process of gathering, consolidating and presenting the information on the Subject Matter.
 - Verify that the calculation criteria have been correctly applied in accordance with the methodologies described in the criteria.
 - Carry out analytical review procedures to support the reasonability of the data.
 - Identify and verify assumptions supporting the calculations.
 - Test, on a sample basis, source information to verify the accuracy of data.
 - Reading the contents on the material topics (GRI 3-1, 3-2, 3-3) associated with the Subject Matter to verify that they have been correctly applied in accordance with the Criteria.
 - Comparing the contents presented in the Report with what is established in "in reference" option self-declared by the Company in accordance with the compliance requirements of GRI 1 Standard.
- We also performed such other procedures as we considered necessary in the circumstances.



AS-2848-25
March 27, 2025

Free Translation

4. EY's Responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information (ISAE 3000 (Revised)), and the terms of reference for this engagement as agreed with Ecopetrol S.A. on November 28th, 2024. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

5. Our Independence and Quality Management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement, and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

6. Description of Procedures Performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.



To: Ecopetrol S.A.

Page 4
March 27, 2025

Free Translation

7. Limitations of Our Assurance Engagement

Our assurance engagement was limited to the Subject Matter included in Annex 1 contained in the Report for the period between January 1st and December 31st, 2024, it does not include information from previous years included in the Report, nor related to projections or goals future. Nor did it attempt to determine whether the technological tools used to develop the Report are the most appropriate and/or efficient.

8. Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the reported in the Integrated Management Report for the period from January 1 to December 31, 2024, detailed in Annex 1, in order for it to be in accordance with Annex 2.

Other information

The notification to the Global Reporting Initiative (GRI) about the publication of The Report, following the guidelines of the GRI 1 standard: Foundations, in accordance requirement: Notify GRI (the organization must notify GRI of the use of the GRI standards and its declaration of use) is responsibility of the Company and we have been informed that it will be done within 5 business days following the issuance of this conclusion.

Cordially,

EDWIN RENE VARGAS SALGADO
Digitally signed by EDWIN RENE VARGAS SALGADO DN: cn=EDWIN RENE VARGAS SALGADO, o=Ernst & Young Audit S.A.S.

Edwin R. Vargas S.
Assurance Associate Partner
Ernst & Young Audit S.A.S.

Nuestra
*
energía



LOCAL
EMPLOYMENT

Local Employment



LOCAL EMPLOYMENT PRIORITIZATION

Concerning the prioritization of local employment, Ecopetrol acts in accordance with and beyond of the provisions of Colombian legislation, Decree 1668 of 2016, when pertaining to hydrocarbon exploration and production projects, which establishes the hiring of 100% unskilled workforce and at least 30% of skilled workforce.

This is why, the Supply Chain Process counts with an indicator which promotes the prioritization of local employment to generate value in the territories and during the selection methods the supplier must present at least a commitment to contract 100% of the local unskilled labor and more than 30% of skilled local labor.

The local employment indicator is one of the main metrics of Ecopetrol's supply chain management, therefore, it is monitored monthly and is part of the key performance indicators of the Function at Company level.

In 2024, Ecopetrol's suppliers reported the hiring of 46.095 worker with exclusive dedication to the activities contracted by the Company, of which 89% (40.803 workers) corresponded to local labor in the regions of operation.

NUMBER OF WORKERS DISTRIBUTED BY ORIGIN	2020	2021	2022	2023	2024
Local*	28,579	35,948	38,841	39.085	40.803
Non-local**	5,385	5,495	6,098	5.847	5.292
Total	33,964	41,443	44,939	44.932	46.095
% Local employment	84%	87%	86%	87%	89%

*Local workforce: person who certifies their residence with the certificate issued by the municipal mayor's office.

**Non-local workforce: worker whose residence is in other regions of the country. If the required labor force is not found in the municipality of the area where the projects are developed, it will be searched in the neighboring municipalities.



Consult the internal normative and the Colombian legislation about this aspect

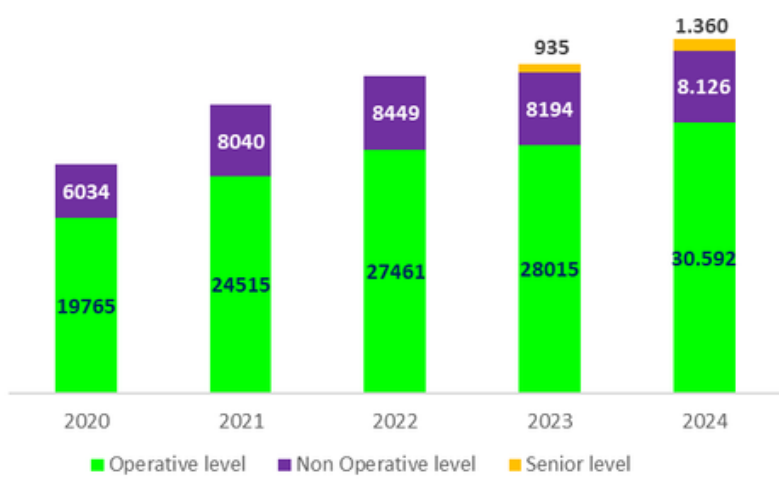
DOCUMENT	SUMMARY	PUBLIC LINK
Guide for labor aspects in activities contracted	Occupational aspects and conditions that must be taken into account in the planning, allocation, execution, balance and closing of a contract that requires the development of personnel by the contractor through the contractor and with exclusive dedication to the contract with Ecopetrol.	LEARN MORE
Decree 1668 of 2016	Decree 1668 of 2016 set out as an express obligation, that when pertaining to hydrocarbon exploration and production projects, which establishes the hiring of 100% unskilled workforce and at least 30% of skilled workforce.	LEARN MORE
Annex Commitment Recruitment of Local Skilled and Unskilled Labor	Format for the commitment to hiring local labor in the different selection methods.	LEARN MORE

Local Employment



LOCAL LABOR IN SENIOR MANAGEMENT POSITIONS

Ecopetrol identified the local labor senior level, defined by the leadership positions, it means, those jobs where the worker has personnel in charge, and must supervise, direct, coordinate, schedule, evaluate, control, assign work or activities of the workers under its supervision or coordination. These are the coordinators or supervisors with staff in charge. In 2024, there were 1.360 local jobs in leadership positions (senior level), as it's shown below:







LOCAL TRAINING ON COMMUNITIES

Aiming to reduce the dependence level of regions on the O&G industry, Ecopetrol offer training spaces to local communities for the improvement of transversal employability abilities. Some of the activities carried out, during 2024, are mentioned below:

EMPLOYMENT FAIRS

Ecopetrol is committed to empowering the communities in which it operates by enhancing employability through its job fairs. These events are designed to foster non-oil employment opportunities, providing community members with essential skills and resources. The main objectives are detailed below:

-  Train the community for professional life and strengthen the relationship with the communities.
-  Encourage the involvement of companies from various sectors, including agro-industrial and services, beyond the oil and gas industry.
-  Train the community members in using the Public Employment System, including job application processes and resume creation.
-  Train the community on how to effectively handle job interviews, thereby strengthening the overall employability of the community.

Local Employment



LOCAL SUPPORT SESSIONS FOR CV REGISTRATION AND UPDATING

The objective of these sessions is to publicize the employability route established by the Ministry of Labor and Social Security, so that people in the localities where Ecopetrol operates know how to register and update their resume/CV on the authorized national employment platform (Public Employment Service) and prevent the intermediation of unauthorized actors.

Additionally, Ecopetrol generates mechanisms for the correct management of communities' high importance aspects, such as labor and employment, hence, the Company has developed spaces for the treatment of concerns, expectations and needs about this critical topic, allowing the strengthening of the relationship between Ecopetrol, its suppliers and the community where it operates. Some of the most relevant are:



“LAPÍZ Y PAPEL” WORKSHOPS

It is based on carrying out academic exercises with the objective of raising awareness among Ecopetrol's non-tier 1 suppliers about the importance of including in their economic offers the aspects corresponding to the labor obligations defined by Ecopetrol. Additionally, these resources are used for the promotion of local employment prioritization, so that contractors and suppliers commit to hiring a greater quantity of local labor to carry out their activities.

These workshops are aimed mainly to non-tier 1 suppliers, however, Ecopetrol tier 1 suppliers may participate to resolve concerns regarding labor obligations.



STEAM CAPACITY DEVELOPMENT AND RENEWABLE ENERGY FOR YOUTH EMPOWERMENT

As part of its commitment to sustainable development and the promotion of education in Colombia, Ecopetrol, in collaboration with Siemens Energy and Fundación Siemens, has implemented the Mobile STEAM Classroom and SDGs Project. This initiative seeks to foster knowledge and skills in Science, Technology, Engineering, Arts, and Mathematics (STEAM), with a particular focus on renewable energy. Through this program, Ecopetrol aims to contribute to the preparation of future generations by equipping young people with the technical and cognitive abilities required to meet the demands of an evolving job market driven by clean energy and innovation.

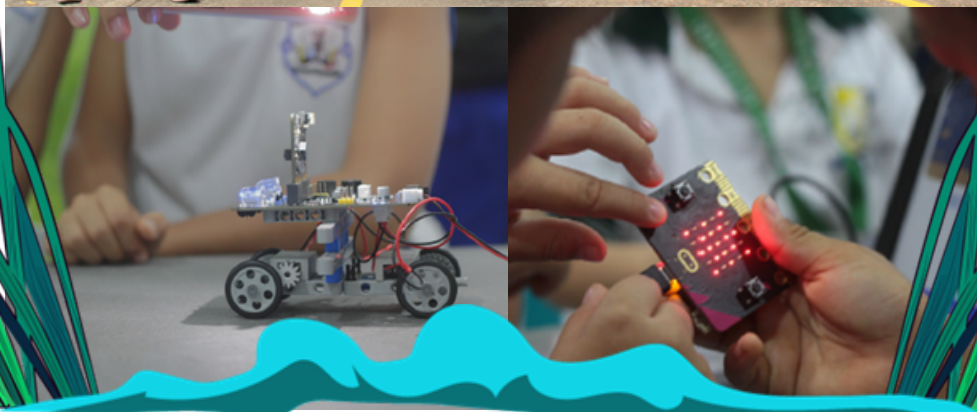
The initiative was designed to increase students' motivation and interest in STEAM disciplines, leveraging technologies like micro:bit microcontrollers and LEGO-type construction kits to enable direct experimentation with engineering and technological concepts. From a pedagogical standpoint, the program not only provided technical knowledge but also developed key skills such as problem-solving, creativity, and teamwork, essential for preparing youth for careers in STEAM-related industries.

Local Employment



Through practical activities, students constructed prototypes of wind turbines, solar trackers, and solar-powered vehicles, allowing them to apply theoretical concepts in a tangible and engaging manner. The incorporation of Micro:bit technology further facilitated access to programming skills, ensuring that participants—regardless of prior experience—could take their first steps in digital literacy.

As a result of this initiative, **2.354** people were inspired to explore STEAM disciplines and gain insight into renewable energy solutions. By fostering a strong educational foundation, Ecopetrol reinforces its commitment to innovation, sustainability, and social responsibility, ensuring that young people in local communities have greater opportunities to access quality education and future employment in emerging industries.



*Nuestra
energía*

SUPPLY CHAIN

SUSTAINABILITY ASSESSMENT



2024